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6 Pro se

7
8 UNITED STATES DISTRICT COURT FOR THE
9 WESTERN DISTRICT OF WASHINGTON

10 ANDREW WATTERS,
11
12 Plaintiff,

13 vs.

14 MAHSA PARVIZ,
15 Defendant.

Case No.: 2:23-cv-00755-RSL

PLAINTIFF'S RESPONSE TO SECOND
ORDER TO SHOW CAUSE

I. INTRODUCTION

Plaintiff Andrew Watters (hereinafter “Plaintiff”) filed his Complaint in this matter on May 19, 2023. Plaintiff has been ordered to show cause why this matter should not be dismissed for the “Computer Fraud and Abuse Act claim has not been adequately pled and that “the values of judicial economy, convenience, fairness, and comity” lead to the conclusion that the Court “should decline the exercise of jurisdiction [over related state claims] by dismissing the case without prejudice.” *Carnegie-Mellon Univ. v. Cohill*, 484 U.S. 343, 350 (1988) (citation omitted).

Plaintiff has properly pleaded his 18 U.S.C. § 1030 claims, including each element of the claims. Therefore, Plaintiff’s Complaint, and subsequent First Amended Complaint is properly before this court.

Additionally, Defendant Mahsa Parviz (hereinafter “Defendant”) has now followed through with her extortion attempt and filed her false and baseless Domestic Violence Restraining Order against Plaintiff.

II. ARGUMENT

A. Legal Standard

“The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.” 28 U.S.C. § 1331.

“To satisfy the requirements for federal diversity jurisdiction under 28 U.S.C. § 1332(a), "a plaintiff must claim, among other things, that the amount in controversy exceeds \$75,000." "A plaintiff satisfies the amount in controversy requirement by claiming a sufficient sum in good faith."” *Giovanno v. Fabec* (11th Cir. 2015) 804 F.3d 1361, 1365 (internal citations omitted). The amount in controversy requirement may be met by aggregating a single plaintiff’s claims

1 against a single defendant. *Gibson v. Chrysler Corp.* (9th Cir. 2001) 261 F.3d 927, 943. It is well
 2 established that punitive damages are part of the amount in controversy in a civil action
 3 (*Gibson v. Chrysler Corp.* (9th Cir. 2001) 261 F.3d 927, 945.)
 4

5 **B. This Court Has Subject Matter Jurisdiction Based on Federal Question**

6 Shortly after the first OSC Notice, Plaintiff amended his Complaint, as is his right. The
 7 First Amended Complaint states a cause of action for computer fraud under 18 U.S.C. sec. 1030,
 8 a federal crime with a private right of action. This Court has subject matter jurisdiction based on
 9 a Federal Question pursuant to 18 U.S.C. sec. 1030(g), which permits civil actions for damages
 10 and injunctive relief against persons committing fraud with computers.
 11

12 **C. Defendant Knowingly Violated 18 U.S.C. § 1030(a)(4)**

13 Whoever 1) knowingly and with intent to defraud, 2) accesses a protected computer
 14 without authorization, or exceeds authorized access, and 3) by means of such conduct furthers
 15 the intended fraud and 4) obtains anything of value, unless the object of the fraud and the thing
 16 obtained consists only of the use of the computer and the value of such use is not more than
 17 \$5,000 in any 1-year period...shall be punished. 18 U.S.C. § 1030(a)(4). Here, Plaintiff has
 18 alleged that Defendant knowingly and with an intent to defraud, accessed a protected computer
 19 exceeding authorized access, and obtained something of value.
 20

21 1. Knowingly And With Intent To Defraud.

22 Defendant knew she did not have the proper credentials to create a Harvard Medical
 23 School webpage, as she was never enrolled in Harvard Medical School. A Harvard extension
 24 program is not the same as attending Harvard Medical School. See attached Exhibit A, a
 25 declaration from the custodian of records at Harvard from 4: 17-CV-000760-ALM-CAN,
 26 Defendant's lawsuit against Harvard. The Harvard's custodian of records' declaration comes
 27
 28

1 from Defendant's lawsuit against Harvard alleging she never received her degree and was denied
 2 financial aid. The case was dismissed due to Defendant's conduct, she "failed to take any action
 3 in this case whatsoever, including repeatedly failing to comply with the Local Rules and Court
 4 Orders: Plaintiffs failed to participate in the Rule 26(f) conference, failed to exchange initial
 5 disclosures (L.R. CV 26), failed to confirm Plaintiffs' current mailing address (L.R. CV 11(d)),
 6 failed to file any response to Defendant's pending motions (L.R. CV 7(e)), failed to appear at the
 7 Rule 16 management conference, and failed to appear at the subsequent Show Cause hearing
 8 ordered by the Court." Attached hereto as Exhibit B is the Report and Recommendation of
 9 United States Magistrate Judge in that case, adopted by the court.
 10
 11

12 Harvard has since taken down Defendant's fraudulent websites, as Defendant was never
 13 enrolled in the Medical School. The various links to her purported "publications" are left with
 14 error messages and the links that do work do not have her cited in them.
 15

16 Defendant had an intent to defraud as she listed herself as a Doctor, a degree she had not
 17 obtained. Defendant was not enrolled, nor had graduated from Harvard Medical School.
 18 Defendant was not enrolled in any Ph.D. program at Harvard, nor had she graduated from any
 19 such program. Simply stated, Defendant cannot hold herself out any type of Doctor from
 20 Harvard, let alone from Harvard Medical School. Therefore, this element is satisfied.
 21

22 2. Accesses A Protected Computer Without Authorization, Or Exceeds Authorized Access

23 Defendant knew she was not enrolled in Harvard Medical School, yet created the website
 24 anyway. Harvard only allows access to "benefits-eligible faculty and staff employed by Harvard
 25 and currently enrolled, degree-seeking students." Defendant was neither "benefits-eligible
 26 faculty and staff employed by Harvard" nor a "currently enrolled, degree-seeking student." Her
 27 representations were false. Defendant exceeded her computer access, as her access was strictly
 28

1 limited only to the extension program, and self-styled herself as a Doctor from Harvard Medical
2 School. This representation of herself is false. An Extension program is not equivalent to
3 Harvard Medical School, let alone a graduate program. Attached hereto as Exhibit C is a copy of
4 Defendant's website via the Internet Archive and a true and correct copy of her website as it
5 existed until being removed from Harvard's web servers following Plaintiff's complaint.
6

7 Defendant did not have authorization from Harvard to present herself to the public, or to
8 any individual such as Plaintiff, as part of Harvard Medical School in any way, shape, or form.
9 Harvard having deleted Defendant's website after learning of her fraud is evidence that
10 Defendant's representations were false.
11

12 Defendant had an intent to defraud as she listed herself as a Medical Doctor, a degree she
13 had not obtained. Defendant was not enrolled, nor had graduated from Harvard Medical School.
14 Defendant was not enrolled in any Ph.D. program at Harvard, nor had she graduated from any
15 such program. Therefore, this element is satisfied.
16

17 3. By Means Of Such Conduct Furthers The Intended Fraud

18 In furtherance of her fraud, in which she uses her her fraudulent "credentials" and
19 "Harvard Medical School" profile to dupe unsuspecting victims, Defendant obtained something
20 of value from Plaintiff. After her unauthorized use of Harvard web servers in order to create her
21 fake Harvard web pages, Defendant obtained money from Plaintiff. Because of her false
22 representations to Plaintiff, based on her fraudulent "credentials" and "Harvard Medical School"
23 profile, Defendant defrauded Plaintiff out of at least \$10,000.00. The loss occurred in May 2021,
24 but the damage was only discovered in February 2022 when Plaintiff discovered that the Harvard
25 web pages were fake and had been created through the indicated computer tampering. In
26 addition, February 2022 is when Plaintiff discovered that Defendant's extensive c.v. sent to
27
28

1 Plaintiff via interstate wire was a complete fabrication. Therefore, this element is satisfied. As
 2 such, this action is timely under 18 U.S.C. sec. 1030(g).

3
 4 4. Obtains Anything Of Value More Than \$5000

5 Defendant obtained something of value from Plaintiff after her unauthorized use of
 6 Harvard web servers in order to create her fake Harvard web pages Because of her false
 7 representations to Plaintiff, based on her fraudulent “credentials” and “Harvard Medical School”
 8 profile, Defendant defrauded Plaintiff out of at least \$10,000.00. The loss occurred in May 2021,
 9 but the damage was only discovered in February 2022 when Plaintiff discovered that the Harvard
 10 web pages were fake and had been created through the indicated computer tampering.

11
 12 As \$10,000 is more than \$5,000, this element is satisfied.

13 **D. Defendant Knowingly Violated 18 U.S.C. § 1030(a)(7)**

14 Whoever 1) with intent to extort from any person any money or other thing of value, 2)
 15 transmits in interstate or foreign commerce any communication 3) containing any—(A) threat to
 16 cause damage to a protected computer; (B) threat to obtain information from a protected
 17 computer without authorization or in excess of authorization or to impair the confidentiality of
 18 information obtained from a protected computer without authorization or by exceeding
 19 authorized access; or (C) demand or request for money or other thing of value in relation to
 20 damage to a protected computer, where such damage was caused to facilitate the extortion; shall
 21 be punished. 18 U.S.C. § 1030(a)(7).
 22
 23

24 The term “protected computer” means a computer—which is used in or affecting
 25 interstate or foreign commerce or communication. 18 U.S.C. § 1030(e)(2)(B). The term “exceeds
 26 authorized access” means to access a computer with authorization and to use such access to
 27 obtain or alter information in the computer that the accesser is not entitled so to obtain or
 28

alter; the term “damage” means any impairment to the integrity or availability of data, a program, a system, or information; 18 U.S.C. § 1030(e)(6); 18 U.S.C. § 1030(e)(8).

1. Defendant’s Attempted Extortion

Here, Defendant attempted to extort Plaintiff into removing his web page about Defendant, which is served from a computer used extensively in interstate commerce. Plaintiff’s website and computer is a thing of value as Plaintiff derives economic value from his website.

2. Defendant’s Transmission in Interstate Commerce

Plaintiff’s primary server containing the web page is physically located in his office in California, and is located on the Internet at IPv4 address 38.122.223.130. Plaintiff’s primary server is used to serve multiple websites worldwide via the Cogent fiber network that connects to the Internet, while also running Plaintiff’s email system. Plaintiff’s email system is also used for worldwide email transmission and receipt. Server logs demonstrate substantial interstate use of Plaintiff’s server by visitors outside California, including Texas where Defendant is originally from. Additionally, Defendant sought restoration of her fake Harvard web pages by threatening Plaintiff via extortionate means. This occurred in May 2023, shortly before this action was filed, and the action is therefore timely.

3. Defendant’s Threat to Cause Damage

“Damage” means any impairment to the integrity or availability of data, a program, a system, or information; 18 U.S.C. § 1030(e)(8). Defendant sought restoration of her fake Harvard web pages by threatening Plaintiff via extortionate means. This restoration impairs the integrity and/or availability of data. As Defendant’s persona is a fake doctor from Harvard Medical School, the availability of this information on the internet would only serve to perpetuate her fraud. Restoration of fake websites impairs the integrity because the information

1 is untrue. Further, Plaintiff cannot legally restore Defendant's fraudulent websites. Plaintiff has
2 no control whatsoever over Harvard's servers or websites, nor is he an authorized user.
3 Defendant's extortion seeks Plaintiff to use illegitimate means. Plaintiff cannot and will not do
4 this.
5

6 **E. Defendant's Extortion**

7 The big picture is Defendant wants to get her biological child back despite multiple court
8 rulings in Texas that her rights have been terminated. Defendant's own criminal trial, for which
9 she is now serving time, noted this. For some reason, Defendant believes that Plaintiff has the
10 ability to effect how Defendant can get her biological child back, and continues to extort Plaintiff
11 in hopes he will comply. The termination of her parental rights has been litigated over and over
12 to the point that other courts have stated she should not try to relitigate the issue via other types
13 of lawsuits such as the one she filed against Plaintiff.
14

15 The most recent threat by Defendant is that Defendant threatened to file her fabricated
16 Domestic Violence Restraining Order unless Plaintiff took down his website. Defendant is under
17 the false belief that if Plaintiff takes down his website, Defendant can regain custody to her
18 biological child.
19

20 Subsequent to this court's Order to Show Cause, Defendant did, in fact, follow through
21 on her extortion attempt, and filed her fabricated Domestic Violence Restraining Order filled
22 with false claims just as Plaintiff feared. Attached hereto as Exhibit D is a true and correct copy
23 of Defendant's filed Domestic Violence Restraining Order.
24

25 These false allegations include false statements about Defendant's filing of a police
26 report in Austin, Texas against Plaintiff that Plaintiff could not possibly been involved in as
27 Defendant filed the Austin police report against an entirely different person, *her brother-in-law*.
28

1 Further, Defendant again fabricated statements relating to her termination of parental rights to
2 her biological child.

3
4
5 **III. Conclusion**

6 For the foregoing reasons, this court has subject matter jurisdiction over this matter.
7 Plaintiff has properly pleaded a cause of action under 18 U.S.C. sec. 1030. Additionally, Plaintiff
8 has met the amount of controversy requirement and satisfied jurisdictional requirements.

9
10 Dated: July 27, 2023

Andrew G. Watters

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Andrew G. Watters
13 Pro se
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Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**MAHSA P KHYAVI and PARVIZ
PHARMACEUTICALS AND
HEALTH SYSTEMS,**

Plaintiffs,

vs.

**PRESIDENT AND FELLOWS OF
HARVARD COLLEGE,**

Defendant.

**CIVIL ACTION NO.
4:17-CV-000760-ALM-CAN**

**DECLARATION OF ROBERT NEUGEBOREN IN SUPPORT OF
HARVARD'S MOTION TO DISMISS**

1. I, Robert Neugeboren, make this Declaration pursuant to 28 U.S.C. § 1746. I am over 21 years of age and of sound mind. I have never been convicted of a felony or other crime of moral turpitude. I am currently employed by President and Fellows of Harvard College ("Harvard") as the Dean of Students and Accessibility of Harvard Extension School. By virtue of my employment, I am a custodian of records kept by Harvard, and I have personal knowledge of how Harvard makes and keeps the records of its regularly conducted activity that are attached to this declaration. Through my job duties and responsibilities with Harvard and after a diligent inquiry and a review of Harvard's business records, including the Harvard Extension School file for Plaintiff Mahsa P. Khyavi ("Plaintiff"), I am personally acquainted with the facts stated herein, and they are true and correct to the best of my knowledge. I further state that I am fully competent to make this declaration.

2. The Harvard Extension School is a separate division of Harvard University, lodged within Harvard's Faculty of Arts and Sciences, a faculty itself distinct from Harvard Medical School.

3. Plaintiff attended Harvard Extension School in Cambridge, Massachusetts. According to her course summary, Plaintiff first enrolled in Fall 2012, and her last reported course was in 2016. Plaintiff applied to the Health Careers Program (HCP) at Harvard Extension School and was conditionally accepted, but she failed to complete the required courses with a grade of B or better, so was never officially admitted to the program. Plaintiff's application, dated February 11, 2014, listed her then-current mailing address as: 25 Calvin St. #2, Somerville, MA 02143, and her then-current home phone number as: 617-419-0690. The area code "617" serves Boston, Massachusetts, and surrounding areas, including Cambridge.¹ A true and correct copy of that application, maintained in the regular course of Harvard's business, is attached hereto as Exhibit 1.

4. Plaintiff did not receive a stipend or any financial aid from Harvard in connection with her attendance at the Harvard Extension School.

5. To the best of my knowledge, Plaintiff was never admitted to Harvard Medical School and has never attended Harvard Medical School. The Harvard Medical School is the only Harvard school that offers the MD degree that Plaintiff insists she earned.

6. To the best of my knowledge, Harvard did not send a representative to travel to Texas at any time to specifically recruit Plaintiff, as a student or employee.

¹ Harvard respectfully requests that the Court take judicial notice of this fact pursuant to Federal Rule of Evidence 201, which provides, "[t]he court may judicially notice a fact that is not subject to reasonable dispute because it (1) is generally known within the trial court's territorial jurisdiction; or (2) can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned." Fed. R. Evid. 201(b).

7. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of October, 2017.



ROBERT NEUGEBOREN

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

MAHSA P. KHYAVI and PARVIZ
PHARMACEUTICALS AND HEALTH
SYSTEM,

Plaintiffs,

V.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE,

Defendant.

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CIVIL ACTION NO. 4:17-CV-00760-ALM-
CAN

**REPORT AND RECOMMENDATION
OF UNITED STATES MAGISTRATE JUDGE**

The above-referenced case was referred to the undersigned United States Magistrate Judge for pre-trial purposes in accordance with 28 U.S.C. § 636. *Pro se* Mahsa P. Khyavi filed the instant suit in state court, on behalf of herself and purportedly on behalf of Plaintiff Parviz Pharmaceuticals and Health System. On October 23, 2017, Defendant President and Fellows of Harvard College removed the action to this Court [Dkt. 1].

Subsequent to removal, Plaintiffs have failed to take any action in this case whatsoever, including repeatedly failing to comply with the Local Rules and Court Orders: Plaintiffs failed to participate in the Rule 26(f) conference, failed to exchange initial disclosures (L.R. CV 26), failed to confirm Plaintiffs' current mailing address (L.R. CV 11(d)), failed to file any response to Defendant's pending motions (L.R. CV 7(e)), failed to appear at the Rule 16 management conference, and failed to appear at the subsequent Show Cause hearing ordered by the Court. As such, the Court recommends Plaintiffs' claims be dismissed under Rule 41.

More specifically, on October 24, 2017, the Court entered an Order Governing Proceedings setting this case for a Rule 16 Management Conference on December 13, 2017 at 2:30 p.m., before the undersigned [Dkt. 6]. Subsequently, Defendant filed several motions, including Defendant's Motion to Dismiss for Lack of Personal Jurisdiction, Motion to Dismiss for Improper Venue, Motion to Dismiss Parviz Pharmaceuticals and Health Systems as a Plaintiff in this Suit, and Motion for More Definite Statement [Dkts. 8, 9, 10, 12]. The Court set each of Defendant's Motions for hearing on December 13, 2017 at 2:30 p.m. and extended Plaintiffs' deadline to file any response to such motions until Monday, November 27, 2017 [Dkt. 14]. The Court further ordered the Parties to meet confer pursuant to Rule 26 on or before Friday, December 8, 2017, and thereafter submit a joint Rule 26(f) conference report and to complete initial mandatory disclosures on or before Monday, December 18, 2017 [Dkt. 14].

Defendant advised the Court, on December 11, 2017, that notwithstanding repeated attempts, Plaintiffs failed to respond to Defendant's communications and failed to comply with the Court's directive to discuss the matters contained in Rule 26(f) [Dkt. 19]. On Wednesday, December 13, 2017, the Court conducted the Rule 16 Management Conference in this matter and called for hearing each of Defendant's pending Motions. Plaintiffs failed to appear, despite being ordered to do so. Lastly, Plaintiffs failed to appear for the Show Cause Hearing set for December 28, 2017, despite the Court's explicit warning that failure to do so would result in a recommendation for the dismissal of the claims filed by Plaintiffs without further notice [Dkt. 22].

Notably, copies of each of the Court's Orders directed to Plaintiffs attention have been returned. The Orders were each sent to the physical address provided by Plaintiffs in Plaintiffs' Verified Original Petition, Application for Declaratory Relief, TRO, Temporary and Permanent Injunction filed in the state court [*see e.g.* Dkt. 1-3 at 43]. To that end, the record reflects the

following entries to the docket of this case on November 17, 2017, December 8, 2017, December 12, 2017, December 27, 2017 and December 28, 2017, respectively:

Mail Returned as Undeliverable. [Mail] sent to MAHSA P. HYAVI returned marked “RETURN TO SENDER – NOT DELIVERABLE AS ADDRESSED – UNABLE TO FORWARD”

Pursuant to Local Rule 11(d), a *pro se* litigant must provide the Court with a physical address and is responsible for keeping the clerk advised in writing of the current physical address. Plaintiffs have failed to keep the clerk advised of Plaintiffs’ current address.

Under Rule 41(b), a court may order the dismissal of an action “[i]f the plaintiff fails to prosecute or to comply with these rules or a court order.” FED. R. CIV. P. 41(b); *see also* Local Rule CV-41 (authorizing the district court to dismiss an action for want of prosecution sua sponte whenever necessary to achieve the orderly and expeditious disposition of cases); *Larson v. Scott*, 157 F.3d 1030, 1031 (5th Cir. 1998); *see generally McCullough v. Lynaugh*, 835 F.2d 1126 (5th Cir. 1988) (a district court may dismiss an action for failure to prosecute or to comply with an order of the court); *Magnuson v. Elec. Data Sys. Corp.*, 252 F.3d 436, 2001 WL 360841 (5th Cir. 2001); *Beard v. Experian Info. Sols. Inc.*, 214 F. App’x 459 (5th Cir. 2007); FED. R. CIV. P. 41(b). “This authority [under Rule 41(b)] flows from the court’s inherent power to control its docket and prevent undue delays in the disposition of pending cases.” *Boudwin v. Graystone Ins. Co., Ltd.*, 756 F.2d 399, 401 (5th Cir. 1985) (citing *Link v. Wabash R.R. Co.*, 370 U.S. 626 (1962)). The exercise of the power to dismiss for failure to prosecute is committed to the sound discretion of the Court and appellate review is confined solely to whether the Court’s discretion was abused. *Green v. Forney Eng’g Co.*, 589 F.2d 243, 248 (5th Cir. 1979); *Lopez v. Aransas County Indep. Sch. Dist.*, 570 F.2d 541, 544 (5th Cir. 1978).

Plaintiffs have failed to take any action in this case since the time of removal. Plaintiffs have failed to comply with the Local Rules and Court Orders, including but not limited to ensuring that a current physical address was provided to the clerk of court. Plaintiffs' failure to comply has prevented this action from proceeding and a Rule 41 dismissal of this lawsuit without prejudice is warranted under these circumstances.

CONCLUSION AND RECOMMENDATION

Accordingly, the Court recommends that this case be dismissed pursuant to Federal Rule of Civil Procedure 41; and that each of Plaintiffs' claims against Defendant be **DISMISSED** without prejudice.

Within fourteen (14) days after service of the magistrate judge's report, any party must serve and file specific written objections to the findings and recommendations of the magistrate judge. 28 U.S.C. § 636(b)(1)(C). In order to be specific, an objection must identify the specific finding or recommendation to which objection is made, state the basis for the objection, and specify the place in the magistrate judge's report and recommendation where the disputed determination is found. An objection that merely incorporates by reference or refers to the briefing before the magistrate judge is not specific.

Failure to file specific, written objections will bar the party from appealing the unobjected-to factual findings and legal conclusions of the magistrate judge that are accepted by the district court, except upon grounds of plain error, provided that the party has been served with notice that such consequences will result from a failure to object. *See Douglass v. United Servs. Auto. Ass'n*, 79 F.3d 1415, 1417 (5th Cir. 1996) (en banc), *superseded by statute on other grounds*, 28 U.S.C. § 636(b)(1) (extending the time to file objections from ten to fourteen days).

SIGNED this 29th day of December, 2017.

CTH

Christine A. Nowak
UNITED STATES MAGISTRATE JUDGE

United States District Court

EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

MAHSA P. KHYAVI, ET AL.

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE

§

§

Civil Action No. 4:17-CV-760

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(Judge Mazzant/Judge Nowak)

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MEMORANDUM ADOPTING REPORT AND RECOMMENDATION OF UNITED STATES MAGISTRATE JUDGE

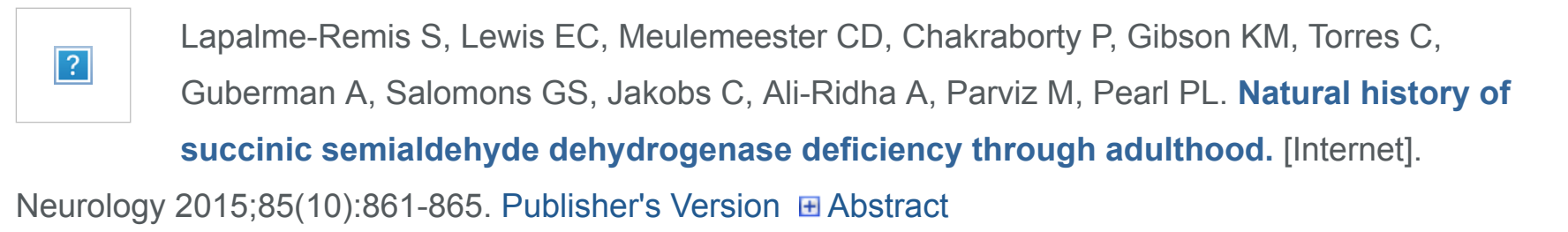
Came on for consideration the report of the United States Magistrate Judge in this action, this matter having been heretofore referred to the Magistrate Judge pursuant to 28 U.S.C. § 636. On December 29, 2017, the report of the Magistrate Judge (Dkt. #26) was entered containing proposed findings of fact and recommendations that Plaintiffs Mahsa P. Khyavi and Parviz Pharmaceuticals and Health System's claims be dismissed pursuant to Federal Rule of Civil Procedure 41, and that each of Plaintiffs' claims against Defendant President and Fellows of Harvard College be dismissed without prejudice.

Having received the report of the United States Magistrate Judge, and no objections thereto having been timely filed, this Court is of the opinion that the findings and conclusions of the Magistrate Judge are correct and adopts the Magistrate Judge's reports as the findings and conclusions of the Court.

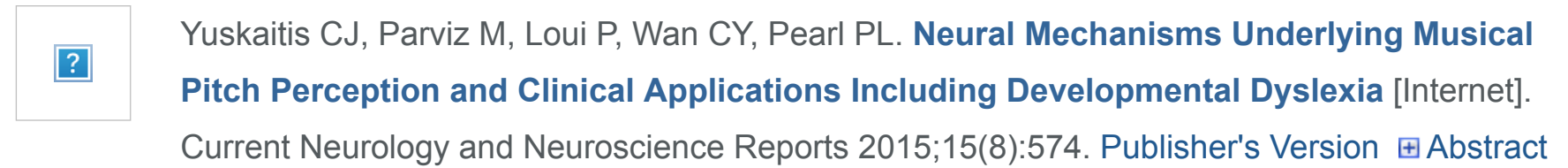
Exhibit C

Publications HMS Innovation Fellows Program ▼ STEPS to Health, Inc. ▼ Classes

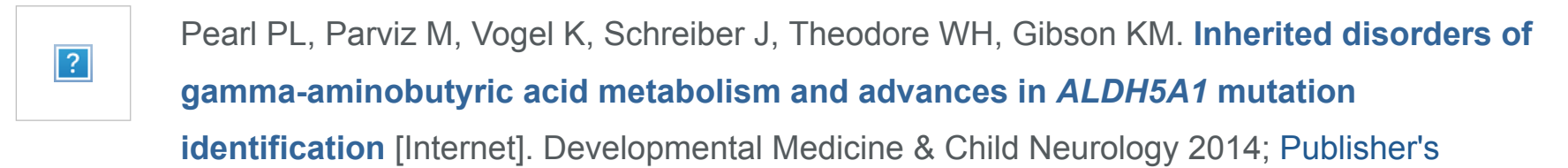
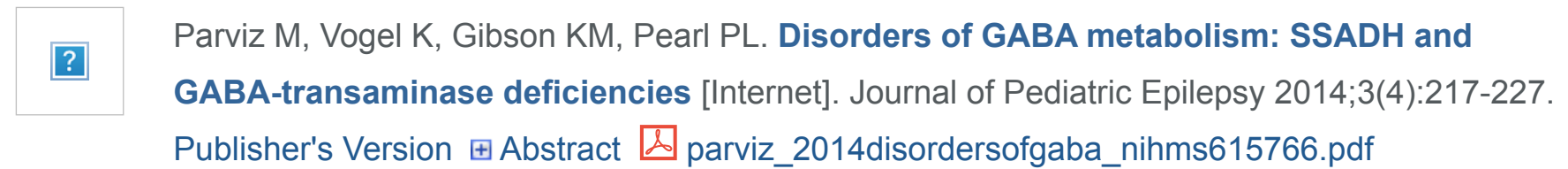
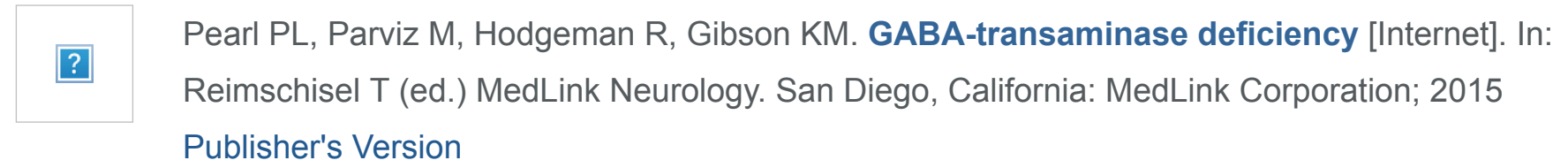
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Neurology 2015;85(10):861-865. [Publisher's Version](#) [Abstract](#)



Current Neurology and Neuroscience Reports 2015;15(8):574. [Publisher's Version](#) [Abstract](#)

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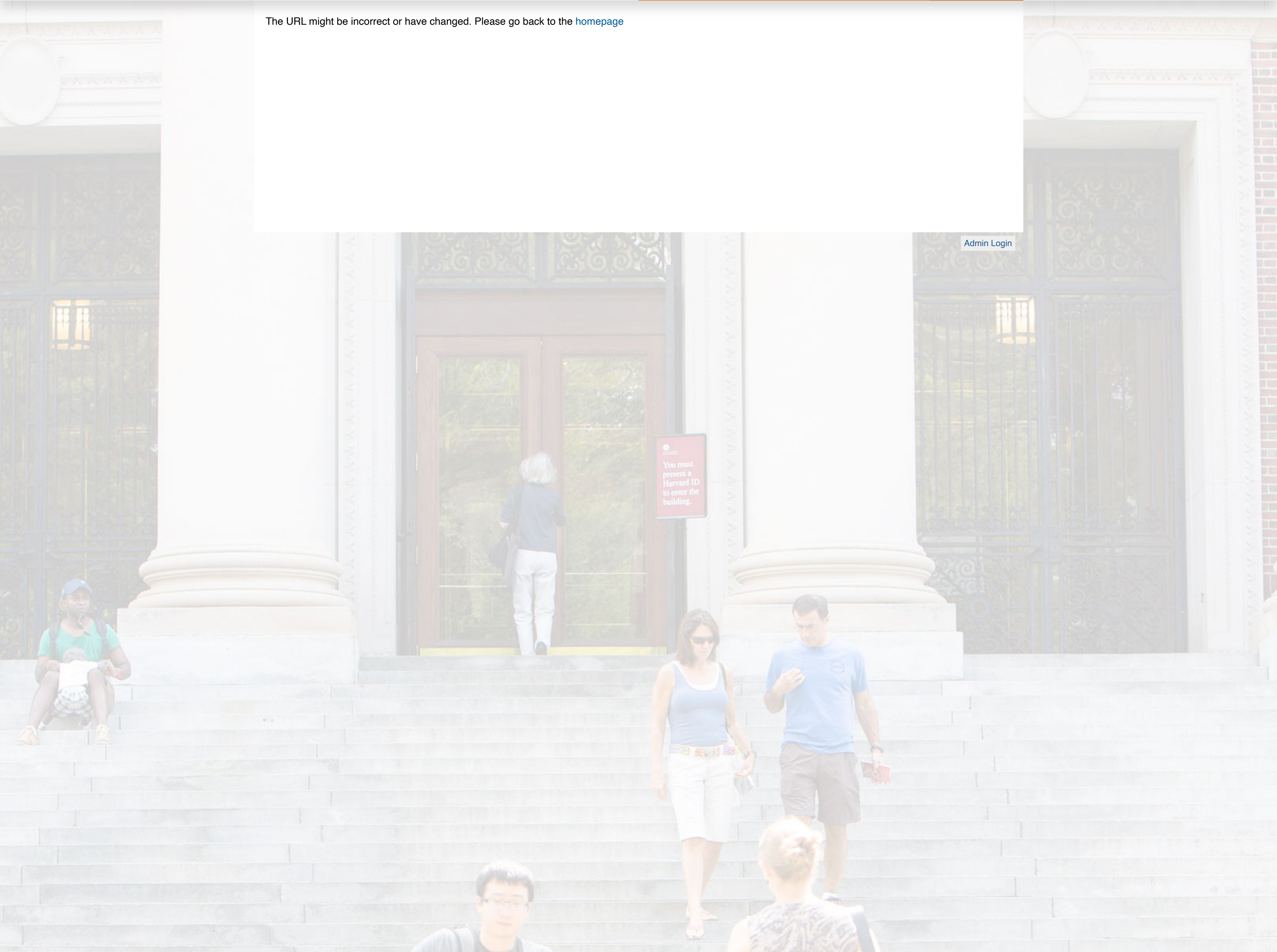


Exhibit D

EX PARTE
FAMILY LAW DEPARTMENT
DV/TRO

Part A:

Case # 23-FAM-01495

MAHSA PARVIZ

and

Case Name ANDREW WATTERS

Date and Time Received 7/19/2023 @ 1:36 PM

☒ Ex Parte by Petitioner X /Respondent _____.

☐ Response to Ex Parte

☐ CLETS Report/Rap Sheet Attached

☐ Other: _____

Part B:

For Judge Use Only:

☐ **Ex Parte Granted:**

☐ **Set in RWC**

☐ **Set in SSF**

☒ **Ex Parte Denied:**

☒ **Set for Hearing**

☐ **No Hearing**

☐ Destroy Criminal History search-FC 6306 (b)(2)

☐ Maintain Criminal History Search in CONFIDENTIAL sealed envelope-FC 6306(d)

☐ Outstanding Warrant-Notify Law Enforcement by contacting
_____ Agency FC 6306(e)

☐ Active Probation/Parole Status:
Notify _____ Agency FC 6306 (f)

☐ No Criminal History provided-Order Signed: Conduct Search – FC 6306 (g)

☐ Other _____.

Please return this to: Ex Parte Clerk-Family Law Unit for processing. Thank You!

DV-100**Request for Domestic Violence Restraining Order****Instructions**

To ask for a domestic violence restraining order, you will need to complete this form and other forms (see page 12 for list of forms). If this case includes sensitive information about a minor child (under 18 years old), see form DV-160-INFO, Privacy Protection For a Minor (Person Under 18 Years Old) Domestic Violence Prevention for more information on how to protect the child's information.

Clerk stamps date here when form is filed.

**Electronically
FILED**by Superior Court of California, County of San Mateo
ON **7/19/2023 1:36 PM**By /s/ Zachary Maffei
Deputy Clerk

Fill in court name and street address:

**Superior Court of California, County of
SAN MATEO**
400 County Center
Redwood City, CA 94063

Court fills in case number when form is filed.

Case Number: **23-FAM-01495****1 Person Asking for Protection**a. **Your name:** Mahsa Parvizb. **Your age:** 31c. **! Address where you can receive court papers**

(This address will be used by the court and by the person in ② to send you official court dates, orders, and papers. For privacy, you may use another address like a post office box, a Safe at Home address, or another person's address, if you have their permission and can get your mail regularly. If you have a lawyer, give their information.)

Address: 3595-1 Inland Empire Blvd, Suite 1240,
City: ONTARIO State: CA Zip: 91764

d. **! Your contact information (optional)**

(The court could use this information to contact you. If you don't want the person in ② to have this information, leave it blank or provide a safe phone number or email address. If you have a lawyer, give their information.)

Telephone: : 909-281-3500 Fax: : 909-281-3501Email Address: thomas@bundy-law.come. **Your lawyer's information (if you have one)**Name: THOMAS M. BUNDY, ESQ. State Bar No.: 297889Firm Name: LAW OFFICES OF THOMAS M BUNDY**2 Person You Want Protection From**a. **Full name:** Andrew Wattersb. **Age (give estimate if you do not know exact age):** 42c. **Date of birth (if known):** 9/2/1980d. **Gender:** ☒ M ☐ F ☐ Nonbinarye. **Race:** Caucasian**This is not a Court Order.**

Case Number: 23-FAM-01495

3 Your Relationship to the Person in ②

(If you do not have one of these relationships with the person in ②, do not complete the rest of this form. You may be eligible for another type of restraining order. Learn more at <https://selfhelp.courts.ca.gov/restraining-orders>.)

(Check all that apply)

- a. ☐ We have a child or children together
(names of children): _____
- b. ☐ We are married or registered domestic partners.
- c. ☐ We used to be married or registered domestic partners.
- d. ☒ We are dating or used to date.
- e. ☐ We are or used to be engaged to be married.
- f. ☐ We are related. The person in ② is my *(check all that apply)*:
- | | |
|---|--|
| <input type="checkbox"/> Parent, stepparent, or parent-in-law | <input type="checkbox"/> Brother, sister, sibling, step-sibling, or sibling in-law |
| <input type="checkbox"/> Child, stepchild, or legally adopted child | <input type="checkbox"/> Grandparent, step-grandparent, or grandparent-in-law |
| <input type="checkbox"/> Child's spouse | <input type="checkbox"/> Grandchild, step-grandchild, or grandchild-in-law |
- g. ☐ We live together or used to live together. *(If checked, answer question below):*
Have you lived together with the person in ② as a family or household (more than just roommates)?
☐ Yes ☐ No *(If no, you do not qualify for this kind of restraining order unless you checked one of the other relationships listed above.)*

4 Other Restraining Orders and Court Cases

- a. Are there any restraining orders currently in place **or** that have expired in the last six months (examples: Did the police give you a restraining order that lasts a few days? Do you have one from the criminal court?)
☒ No
☐ Yes *(If yes, give information below and attach a copy if you have one.)*
(1) (date of order): _____ (date it expires): _____
(2) (date of order): _____ (date it expires): _____
- b. Are you involved in any other court case with the person in ②?
☐ No
☒ Yes *(If you know, list where the case was filed (city, state, or tribe), the year it was filed, and case number.)*
☐ Custody _____
☐ Divorce _____
☐ Juvenile *(child welfare or juvenile justice)*: _____
☐ Guardianship _____
☐ Criminal _____
☒ Other *(what kind of case?)*: Civil / Eastern District of Washington; 2023; 2:23-cv-00755-RSL

This is not a Court Order.



Case Number: 23-FAM-01495

Describe Abuse

In this section, explain how the person in (2) has been abusive. The judge will use this information to decide your request. Listed below are some examples of what "abuse" means under the law. **It is not a complete list** of all examples of abuse. Give information on any incident that you believe was abusive.

- made repeated unwanted contact with you
- tracked, controlled, or blocked your movements
- kept you from getting food or basic needs
- isolated you from friends, family, or other support
- made threats based on actual or suspected immigration status
- made you do something by force, threat, or intimidation
- stopped you from accessing or earning money
- tried to control/interfere with your contraception, birth control, pregnancy, or access to health information
- harassed you
- hit, kicked, pushed, or bit you
- injured you or tried to
- threatened to hurt or kill you
- sexually abused you
- abused a pet or animal
- destroyed your property
- choked or strangled you
- abused your children

5 Most recent abuse

- a. Date of abuse (give an estimate if you don't know the exact date): July 17, 2023
- b. Did anyone else hear or see what happened on this day?
☐ I don't know ☐ No ☒ Yes (If yes, give names): Website is available to the public
- c. Did the person in (2) use or threaten to use a gun or other weapon?
☒ No ☐ Yes (If yes, describe gun or weapon):
- d. Did the person in (2) cause you any emotional or physical harm?
☐ No ☒ Yes (If yes, describe harm):
 Please see Declaration of Mahsa Parviz
- e. Did the police come? ☐ I don't know ☒ No ☐ Yes (If the police gave you a restraining order, list it in (4).)
- f. Give more details about how the person in (2) was abusive on this day. Details can include what was said, done, or sent to you (examples: text messages, emails, or pictures), how often something happened, etc.
 Please see Declaration of Mahsa Parviz

- g. How often has the person in (2) abused you like this?
☐ Just this once ☐ 2 –5 times ☐ Weekly ☒ Other: Daily
 Give dates or estimates of when it happened, if known:
 Daily as website is available to the public

This is not a Court Order.

Case Number: 23-FAM-01495

⑥ Has the person in ② abused you in a different way from the abuse you described in ⑤? If yes, describe below.

- a. Date of abuse (give an estimate if you don't know the exact date): August 17, 2021
- b. Did anyone else hear or see what happened on this day?
☒ I don't know ☐ No ☐ Yes (If yes, give names): _____
- c. Did the person in ② use or threaten to use a gun or other weapon?
☒ No ☐ Yes (If yes, describe gun or weapon): _____
- d. Did the person in ② cause you any emotional or physical harm?
☐ No ☒ Yes (If yes, describe harm):
Please see Declaration of Mahsa Parviz

- e. Did the police come? ☐ I don't know ☒ No ☐ Yes (If the police gave you a restraining order, list it in ④.)
- f. Give more details about how the person in ② was abusive on this day. Details can include what was said, done, or sent to you (examples: text messages, emails, or pictures), how often something happened, etc.
On August 17, 2021, after 5 weeks of not hearing from me, he again tracked my location and mailed me an
eerie letter wherein he admits to constantly searching for me, stating "I happened to notice online in a routine
search" in reference to my physical location. Although I am well-known in my field as a Harvard-trained
medical research scientist and have been an elected member of the American Academy of Neurology since
2016, Mr. Watters continues to contact and spread rumors to my employers, research sponsors and legal team
without my consent of knowledge in an attempt to sabotage my career, reputation, peace of mind, the
cooperation agreement and related cases. In this letter, he admits to spreading highly inappropriate and false
rumors to my legal team and others about my personal life, my mental health and alleged incompetence,
stating: "I simply don't think you are competent to stand trial in a Federal felony case, and I have shared this
concern with your defense counsel. Feel free to have your attorney reach out .

- g. How often has the person in ② abused you like this?
☐ Just this once ☐ 2–5 times ☐ Weekly ☒ Other: Various times
Give dates or estimates of when it happened, if known:
Throughout 2021 and 2022.

This is not a Court Order.



Case Number: 23-FAM-01495

**7 Is there other abuse by the person in ② that you want the judge to know about?
If yes, describe below.**

- a. Date of abuse (*give an estimate if you don't know the exact date*): June 2021 _____
- b. Did anyone else hear or see what happened on this day?
☒ I don't know ☐ No ☐ Yes (*If yes, give names*): _____
- c. Did the person in ② use or threaten to use a gun or other weapon?
☒ No ☐ Yes (*If yes, describe gun or weapon*): _____
- d. Did the person in ② cause you any emotional or physical harm?
☐ No ☒ Yes (*If yes, describe harm*):
Please see Declaration of Mahsa Parviz _____
- e. Did the police come? ☐ I don't know ☒ No ☐ Yes (*If the police gave you a restraining order, list it in ④*.)
- f. Give more details about how the person in ② was abusive on this day. Details can include what was said, done, or sent to you (examples: text messages, emails, or pictures), how often something happened, etc.
My attempts to distance myself and keep my Atherton residence only made his stalking worse. Mr. Watters started following me to my gym, the Equinox in Palo Alto, and would wait for me in the parking lot for several hours. By June 2021, I had told him my Equinox membership had expired in an effort to prevent further stalking. Staff informed me that Mr. Watters was searching for me while I remained at Equinox for several hours, afraid to leave my gym. He waited in the parking lot for 45 minutes after Equinox closed and confronted me on my way to my vehicle. On his law firm webpage, he publicly admits to this, stating "I witnessed her commit at least one petty theft when she deliberately entered a gym without paying after she told me her membership had expired, and then abused their generosity by using the entire facility for hours, even after they closed and I was waiting for her in the parking lot for about 45 minutes."

- g. How often has the person in ② abused you like this?
☐ Just this once ☒ 2-5 times ☐ Weekly ☐ Other: _____
Give dates or estimates of when it happened, if known:
Multiple occasions in 2021 - 2022.

- ☐ **Check this box if you need more space to describe the abuse.** You can use form DV-101, Description of Abuse, and turn it in with this form. You can also use a separate sheet of paper, write "Describe Abuse" abuse at the top, and turn it in with this form.

This is not a Court Order.



Case Number: 23-FAM-01495

8 Other Protected People

Do you want the restraining order to protect your children, family, or someone you live with?

a. ☐ Nob. ☒ Yes (If yes, complete the section below):

(1) Full name	Age	Relationship to you	Lives with you?
Maryam F Parviz	43	Sister	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Bahman Parviz	72	Father	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Shamsi Damavandi	68	Mother	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Clara Masha Parviz	6	Biological Relative	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

☐ Check this box if you need to list more people. Use a separate piece of paper and write "DV-100, Other Protected People" at the top. Turn it in with this form.

(2) Why do these people need protection?

Restrained Party has continued to harass and cause harm to the relatives listed in 8(b)(1). Although they do not reside with me, they have been targeted by Restrained Party on his website. On his law firm webpage, he publicly makes offensive, false comments about me, about matters he became privy to through the course of his legal representation, and about my whole family. His comments have injured and traumatized my entire family, including my five-year-old daughter, sister, and parents, both of whom are college math professors and senior citizens. My parents have lost teaching assignments and investments, cursed at, publicly ridiculed and even hospitalized from the emotional turmoil Mr. Watters has created for my entire family.

9 Does Person in 2 Have Firearms (Guns), Firearm Parts, or Ammunition?

(A firearm includes a handgun, rifle, shotgun, and assault weapon. A firearm part means a receiver, frame, or unfinished receiver or unfinished frame. Ammunition includes bullets, shells, cartridges, and clips.)

a. ☐ I don't knowb. ☐ Noc. ☒ Yes (If you have information, complete the section below.)

Describe firearms (guns), firearm parts, or ammunition	How many or what amount?	Location, if known
(1) Unknown to Protected Party	Unknown	Unknown
(2)		
(3)		
(4)		
(5)		
(6)		

This is not a Court Order.

Case Number: 23-FAM-01495

Choose the Orders That You Want a Judge to Make

In this section, you will choose the orders you want a judge to make now. Every situation is different.
Choose the orders that fit your situation.

Check all the orders that you want a judge to make (order).

10 ☒ Order to Not Abuse

I ask the judge to order the person in (2) to not do the following things to me or anyone listed in (8):

Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, molest, destroy personal property, keep under surveillance, impersonate (on the internet, electronically, or otherwise), block movements, annoy by phone or other electronic means (including repeatedly contact), or disturb the peace. (For more information on what "disturbing the peace" means, read form DV-500-INFO, Can A Domestic Violence Restraining Order Help Me?)

11 ☒ No-Contact Order

I ask the judge to order the person in (2) to not contact me or anyone listed in (8).

12 ☒ Stay-Away Order

a. I ask the judge to order the person in (2) to stay away from:

(Check all that apply)

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Me. | <input type="checkbox"/> My vehicle. | <input type="checkbox"/> My children's school or childcare. |
| <input checked="" type="checkbox"/> My home. | <input type="checkbox"/> My school. | <input type="checkbox"/> Other (please explain): _____ |
| <input type="checkbox"/> My job or workplace. | <input checked="" type="checkbox"/> Each person in (8). | |

b. How far do you want the person to stay away from all the places you checked above?

- ☒ 100 yards (300 feet) ☐ Other (give distance in yards): _____

c. Do you and the person in (2) live together or live close to each other?

- ☒ No ☐ Yes (If yes, check one):
- ☐ Live together (If you live together, you can ask that the person in (2) move out in (13).)
 - ☐ Live in the same building, but not in the same home
 - ☐ Live in the same neighborhood
 - ☐ Other (please explain): _____

d. Do you and the person in (2) have the same workplace or go to the same school?

- ☒ No ☐ Yes (If yes, check all that apply):
- ☐ Work together at (name of company): _____
 - ☐ Go to the same school (name of school): _____
 - ☐ Other (please explain): _____

This is not a Court Order.



Case Number: 23-FAM-01495

13 ☐ **Order to Move Out**a. I ask the judge to order the person in **(2)** to move out of the home, located at:

(Give address): _____

b. I have a right to live at this address because:

(Check all that apply)

☐ I own the home.☐ I have lived at this address for _____ years, _____ months.☐ My name is on the lease.☐ I pay for some or all the rent or mortgage.☐ I live at this address with my child(ren).☐ Other (please explain): _____**14** ☒ **Other Orders**(Describe any additional orders you want the judge to make to keep you, your children, or the people in **(8)** safe.):

I respectfully ask this court for an order for Restrained Party to take down the part of his website that has any information about me and my family. Specifically, his "hall of shame" tab on his law firm web page. I further ask that he is refrained writing about me on any platform including web pages and social media.

15 ☐ **Child Custody and Visitation**

(Check this box if you have a child with the person in **(2)** and want the judge to make or change a child custody or visitation order. **You must fill out form DV-105, Request for Child Custody and Visitation Orders, and attach it to this form.**)

Orders that you can request on form DV-105 include:

- Child custody
- No visits with your children
- Stop person in **(2)** from accessing your child's school or medical information
- Supervised (monitored) visits with your children
- Unsupervised (unmonitored) visits with your children

This is not a Court Order.

Case Number: 23-FAM-01495

16 ☐ **Protect Animals**

a. (You may ask the court to protect your animals, your children's animals, or the person in ②'s animals.)

Name (or other way to ID animal)	Type of animal	Breed (if known)	Color
(1) _____	_____	_____	_____
(2) _____	_____	_____	_____
(3) _____	_____	_____	_____
(4) _____	_____	_____	_____

b. I ask the judge to protect the animals listed above by ordering the person in ② to:

(Check all that apply)

- (1) ☐ Stay away from the animals by at least: ☐ 100 yards (300 feet) ☐ Other (number of yards): _____
- (2) ☐ Not take, sell, hide, molest, attack, strike, threaten, harm, get rid of, transfer, or borrow against the animals.
- (3) ☐ Give me sole possession, care, and control of the animals because (check all that apply):
- ☐ Person in ② abuses the animals. ☐ I take care of these animals.
- ☐ I purchased these animals. ☐ Other (please explain): _____

17 ☐ **Control of Property**a. I ask the judge to give **only me** temporary use, possession, and control of the property listed here (describe):

b. Explain why you want control of the property you listed:

18 ☐ **Health and Other Insurance**I ask the judge to order the person in ② to **not** make any changes to any insurance or other coverage for me, the person in ②, or our children, including not being allowed to cancel, cash, borrow against, transfer, dispose of, or change the beneficiaries for the insurance.**19** ☒ **Record Communications**

I ask the judge to allow me to record calls or communications the person in ② makes to me, when those calls or communications violate this restraining order.

This is not a Court Order.

Case Number: 23-FAM-01495

(20) ☐ Property Restraint *(only if you are married or a registered domestic partner with the person in (2).)*

I ask the judge to order the person in (2) **not to** borrow against, sell, hide, or get rid of or destroy any possessions or property, except in the usual course of business or for necessities of life. I also ask the judge to order the person in (2) to notify me of any new or big expenses and to explain them to the court.

(21) ☐ Extend My Deadline to Give Notice to Person in (2)

(Usually, the judge will give you about two weeks to give notice, or to "serve" the person in (2) of your request. If you need more time to serve, the judge may be able to give you a few extra days.)

I ask the judge to give me more time to serve the person in (2) because *(explain why you need more time)*:

(22) ☐ Pay Debts (Bills) Owed for Property

(If you want the person in (2) to pay any debts owed for property, list them and explain why. The amount can be for the entire bill or only a portion. Some examples include rent, mortgage, car payment, etc.)

a. I ask the judge to order the person in (2) to make these payments while the restraining order is in effect:

(1) Pay to: _____	For: _____	Amount: \$ _____	Due date: _____
(2) Pay to: _____	For: _____	Amount: \$ _____	Due date: _____
(3) Pay to: _____	For: _____	Amount: \$ _____	Due date: _____

Explain why you want the person in (2) to pay the debts listed above:

b. **Special decision (finding) by the judge if you did not agree to the debt** *(optional)*

(If you did not agree to the debt or debts listed above, you can ask the judge to decide (find) that one or more debts was made without your permission and resulted from the person in (2)'s abuse. This may help you defend against the debt if you are sued in another case.)

Do you want the judge to make this special decision (finding)?

☐ No ☐ Yes *(If yes, answer the questions below.)*

(1) Which of the debts listed above resulted from the abuse? *(check all that apply):*

☐ a(1) ☐ a(2) ☐ a(3)

(2) Do you know how the person in (2) made the debt or debts?

☐ No ☐ Yes

(If yes, explain how the person in (2) made the debt or debts):

This is not a Court Order.



Case Number: 23-FAM-01495

Orders That You Want a Judge to Make at Your Court Date

Below is a list of orders that a judge cannot make right away but can make at your court date in a few weeks. The person in (2) must be notified of your court date before the judge can consider making any of the orders listed below. Check all the orders that you want the judge to make at your court date.

(23) ☐ Pay Expenses Caused by the Abuse

I ask the judge to order the person in (2) to pay for things **caused directly** by the person in (2) (damaged property, medical care, counseling, temporary housing, etc.). Bring proof of these amounts to your court date.

Pay to: _____	For: _____	Amount: \$ _____
Pay to: _____	For: _____	Amount: \$ _____
Pay to: _____	For: _____	Amount: \$ _____

(24) ☐ Child Support *(this only applies if you have a minor child with the person in (2))*

(Check all that apply)

- a. ☐ I do not have a child support order and I want one.
- b. ☐ I have a child support order and I want it changed *(attach a copy if you have one)*.
- c. ☐ I now receive or have applied for TANF, Welfare, or CalWORKS.

(25) ☐ Spousal Support *(this only applies if you are married or a registered domestic partner with person in (2))*

I ask the judge to order the person in (2) to give me financial assistance.

(26) ☐ Lawyer's Fees and Costs

I ask that the person in (2) pay for some or all of my lawyer's fees and costs.

(27) ☐ Batterer Intervention Program

I ask the judge to order the person listed in (2) to go to a 52-week batterer intervention program.

(The goal of a batterer's intervention program is to stop abuse. There are weekly classes to teach accountability, abuse effects, and gender roles. If ordered to complete this program, the person in (2) would have to show proof to the judge that they enrolled and completed the program.)

(28) ☐ Transfer of Wireless Phone Account

(If the person in (2) holds the rights to your cell phone account, you can ask the judge to transfer your number or your child's number to you. This means you will be financially responsible for these accounts. If you want to have control over a mobile device, like a cell phone, make this request at (17).)

I ask the judge to order the wireless service provider to transfer the billing responsibility and rights to the wireless phone numbers listed below to me because the account currently belongs to the person in (2):

- a. ☐ My number ☐ Number of child in my care (including area code): _____
- b. ☐ My number ☐ Number of child in my care (including area code): _____

This is not a Court Order.



Case Number: 23-FAM-01495

Automatic Orders if the Judge Grants Restraining Order**29 No Firearms (Guns), Firearm Parts, or Ammunition**

If the judge grants you a restraining order, the person in ② must turn in, sell, or store any firearms (guns), firearm parts, or ammunition that they have or control. The person in ② would also be prohibited from buying firearms (guns), firearm parts, and ammunition.

30 Cannot Look for Protected People

If the judge grants you a restraining order, the person in ② will not be allowed to look for the address or location of any person protected by the restraining order, unless the court finds good cause not to make this order.

31 Additional pages

If you used additional paper or forms, enter the number of extra pages attached to this form: _____

32 Your signature

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: July 18, 2023

Mahsa Parviz

Type or print your name



Sign your name

33 Your lawyer's signature (if you have one)

Date: July 18, 2023

Thomas Bundy

Lawyer's name



Lawyer's signature

Your Next Steps**1 You must complete at least three additional forms:**

- Form DV-110, Temporary Restraining Order (only items 1, 2 and 3)
- Form DV-109, Notice of Court Hearing (only items 1 and 2)
- Form CLETS-001, Confidential CLETS Information
- **If you are asking for child custody and visitation orders, you must complete form DV-105, Request for Child Custody and Visitation Orders, and form DV-140, Child Custody and Visitation Order.**

2 Turn in your completed forms to the court. Find out when your forms will be ready for pick up.**3 Once you get your forms back from the court, have someone "serve" a copy of all forms on the person in ②. The sheriff or marshal can do this for free. Learn more about how to "serve" your papers and prepare for your court date: <https://selfhelp.courts.ca.gov/sheriff-serves-your-request-restraining-order>.****4 If you are asking for child support, spousal support, or lawyer's fees, you must also complete form FL-150, Income and Expense Declaration. If you are only asking for child support, you may be eligible to fill out a simpler form, FL-155. Read form DV-570 to see if you are eligible. Turn in your completed form to the court before your court date. You must also have someone mail or personally deliver a copy to the person in ②.****This is not a Court Order.**

DV-109**Notice of Court Hearing**

Instruction: The person asking for a restraining order must complete items ① and ②. The court will complete the rest of this form.

① **Person Asking for Protection**Name: Mahsa ParvizElectronically
RECEIVED② **Person to Be Restrained**Name: Andrew Watters

7/19/2023 1:36 PM

CLERK OF THE SUPERIOR COURT
SAN MATEO COUNTY*The court will fill out the rest of this form.*③ **Notice of Hearing**

A court hearing is scheduled on the request for restraining orders against the person in ②:

Clerk stamps date here when form is filed.

Electronically
FILED

By Superior Court of California, County of San Mateo

ON 07/19/2023

By /s/ Maffei, Zachary

Deputy Clerk

Fill in court name and street address:

Superior Court of California, County of
SAN MATEO
400 County Center
Redwood City, CA 94063

Court fills in case number when form is filed.

Case Number: 23-FAM-01495

Date: 8/9/2023 Time: 8:30 a.m.
Dept.: DVPA Room: TBD

Name and address of court if different from above:

You may attend your court date remotely, such as by phone or videoconference. For more information, go to the court's website for the county listed above. To find the court's website, go to: www.courts.ca.gov/find-my-court.htm.

④ **Temporary Restraining Orders (Any orders granted are attached on form DV-110.)**

a. Temporary Restraining Orders (any order requested under Family Code section 6320):

(Check one):

- (1) ☐ All **granted** until the court hearing.
 (2) ☒ All **denied** until the court hearing. (Reasons for denial are given below in b.)
 (3) ☐ Partly **granted** and partly **denied** until the court hearing. (Reasons for denial are given below in b.)

b. Reasons for denial of some or all of the orders requested on form DV-100.

- (1) ☐ The facts given in the request (form DV-100) do not show reasonable proof of a past act or acts of abuse. (Family Code sections 6300, 6320, and 6320.5.)
 (2) ☒ The facts given in the request do not give enough detail about the most recent incidents of abuse, including what happened, the dates, who did what to whom, or any injuries or history of abuse.
 (3) ☐ Other reasons for denial:



Case Number:

23-FAM-01495

5 Confidential Information Regarding Minor

- a. ☐ A *Request to Keep Minor's Information Confidential* (form DV-160) was made and **granted** (see form DV-165, *Order on Request to Keep Minor's Information Confidential*, served with this form.)
- b. **If the request was granted, the information described on the order (form DV-165, item ⑦) must be kept CONFIDENTIAL. The disclosure or misuse of the information is punishable as a sanction, with a fine of up to \$1,000 or other court penalties.**

6 Service of Documents by the Person in ①

At least ☒ five ☐ _____ days before the hearing, someone age 18 or older—not you or anyone to be protected—must personally give (serve) a court file-stamped copy of this form (DV-109, *Notice of Court Hearing*) to the person in ② along with a copy of all the forms indicated below:

- a. DV-100, *Request for Domestic Violence Restraining Order* (file-stamped)
- b. ☐ DV-110, *Temporary Restraining Order* (file-stamped), **if granted**
- c. DV-120, *Response to Request for Domestic Violence Restraining Order* (blank form)
- d. DV-120-INFO, *How Can I Respond to a Request for Domestic Violence Restraining Order?*
- e. DV-250, *Proof of Service by Mail* (blank form)
- f. ☐ DV-170, *Notice of Order Protecting Information of Minor*, and DV-165, *Order on Request to Keep Minor's Information Confidential* (file-stamped), **if granted**
- g. ☐ Other (specify): _____

Electronically
SIGNED

Judge's Signature

Date: 07/19/2023

By /s/ Padilla, Rosendo

Judicial Officer

Right to Cancel Hearing: Information for the Person in ①

- If item ④a(2) or ④a(3) is checked, the judge has denied some or all of the temporary orders you requested until the court hearing. The judge may make the orders you want after the court hearing. You can keep the hearing date, or you can cancel your request for orders so there is no court hearing.
- If you want to cancel the hearing, use form DV-112, *Waiver of Hearing on Denied Request for Temporary Restraining Order*. Fill it out and file it with the court as soon as possible. You may file a new request for orders, on the same or different facts, at a later time.
- If you cancel the hearing, do not serve the documents listed in item ⑥ on the other person.
- If you want to keep the hearing date, you must have all of the documents listed in item ⑥ served on the other person within the time listed in item ⑥.
- At the hearing, the judge will consider whether denial of any requested orders will jeopardize your safety and the safety of children for whom you are requesting custody or visitation.
- You must attend the hearing if you want the judge to make restraining orders or continue any orders already made. If you cancel the hearing or do not attend the hearing, any restraining orders made on form DV-110 will end on the date of the hearing.



Case Number: 23-FAM-01495

To the Person in ①:

- The court cannot grant a long-term restraining order unless the person in ② has been personally given (served) a copy of your request and any temporary orders. To show that the person in ② has been served, the person who served the forms must fill out a proof of service form, like form DV-200, *Proof of Personal Service*.
- For information about service, read form DV-200-INFO, *What Is "Proof of Personal Service"?*
- If you are unable to serve the person in ② in time, you may ask for more time to serve the documents. Read form DV-115-INFO, *How to Ask for a New Hearing Date*.

To the Person in ②:

- If you want to respond in writing, mail a copy of your completed form DV-120, *Response to Request for Domestic Violence Restraining Order*, to the person in ① and file it with the court. You cannot mail form DV-120 yourself. Someone age 18 or older — **not you** — must do it.
- To show that the person in ① has been served by mail, the person who mailed the form must fill out a proof of service form. Form DV-250, *Proof of Service by Mail*, may be used. File the completed form with the court before the hearing and bring a copy with you to the hearing.
- For information about responding to a restraining order and filing your answer, read form DV-120-INFO, *How Can I Respond to a Request for Domestic Violence Restraining Order?*
- If you are unable to attend your court hearing or need more time to prepare your case, you may ask the judge to reschedule your court date. Read form DV-115-INFO, *How to Ask for a New Hearing Date*.
- Whether or not you respond in writing, attend the hearing if you want the judge to hear from you before making an order. At the hearing, tell the judge why you agree or disagree with the orders requested. Bring any evidence or witnesses you have. Read form DV-520-INFO, *Get Ready for Your Restraining Order Court Hearing*.
- **At the hearing, the judge may make restraining orders against you that could last up to five years.**
- **The judge may also make other orders about your children, child support, spousal support, money, and property and may order you to turn in, sell, or store any firearms (guns), firearm parts, or ammunition that you own or have.**

**Request for Accommodations**

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the hearing. Contact the clerk's office or go to www.courts.ca.gov/forms for *Disability Accommodation Request* (form MC-410). (Civil Code section 54.8.)

(Clerk will fill out this part.)

—Clerk's Certificate—

Clerk's Certificate
[seal]

I certify that this *Notice of Court Hearing* is a true and correct copy of the original on file in the court.

Date: _____ Clerk, by _____, Deputy

DV-110**Temporary Restraining Order**
☐ Original Order ☐ Amended Order

Instruction: The person asking for a restraining order must complete items (1), (2), and (3) only. The court will complete the rest of this form.

(1) Protected Person (name): Mahsa Parviz

(2) Restrained Person

*Full Name: Andrew Watters

*Gender: ☒ M ☐ F ☐ Nonbinary

*Age: 42 (Give estimate, if age unknown.)

Date of Birth: 9/2/1980 Height: 6'0" Weight: 200

Hair Color: Brown Eye Color: Blue

*Race: Caucasian

Relationship to person in (1): Ex-boyfriend/Previous Attorney

Address of restrained person: 801 N Humboldt St (Unit Unknown)

City: San Mateo State: CA Zip: 94401

Type, number, and location of firearms, firearm parts, or ammunition:
Unknown to Protected Person

(Information that has a star (*) next to it is required to add this order into a California police database. Give all the information you know.)

Clerk stamps date here when form is filed.

Electronically

FILED

By Superior Court of California, County of San Mateo

ON 07/19/2023

By /s/ Maffei, Zachary

Deputy Clerk

Fill in court name and street address:

Superior Court of California, County of
SAN MATEO

400 County Center
Redwood City, CA 94063

Court fills in case number when form is filed.

Case Number:

23-FAM-01495

Electronically

RECEIVED

7/19/2023 1:36 PM

CLERK OF THE SUPERIOR COURT
SAN MATEO COUNTY

(3) ☒ Other Protected People

In addition to the person named in (1), the people listed below are protected by the orders listed in (8) through (11).

Full name	Relationship to person in (1)	Age
Maryam F Parviz	Sister	43
Bahman Parviz	Father	72
Shamsi Damavandi	Mother	68
Clara Mahsa Parviz	Biological Relative	6

☐ Check here if you need to list more people. List them on a separate piece of paper, write "DV-110, Other Protected People" at the top, and attach it to this form.

(The court will complete the rest of this form)

(4) Your Hearing Date (Court Date)



This order expires at the end of the hearing listed below:

Hearing Date: _____ Time: _____ ☐ a.m. ☐ p.m.

This order must be enforced throughout the United States. See page 7.

This is a Court Order.



Case Number: 23-FAM-01495

To the Person in (2)

The judge has granted temporary orders. See items (5) through (20). If you do not obey these orders, you can be charged with a crime, go to jail or prison, and/or pay a fine. It is a felony to take or hide a child in violation of this order.

(5) No Firearms (Guns), Firearm Parts, or Ammunition

- a. You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get any prohibited item listed below in b.
- b. **Prohibited items are:**
 - (1) Firearms (guns);
 - (2) Firearm parts (receiver, frame, or unfinished receiver or frame as defined in Penal Code section 16531); and
 - (3) Ammunition.
- c. Within 24 hours of receiving this order, you must sell to or store with a licensed gun dealer, or turn in to law enforcement, any prohibited items you have in your immediate possession or control.
- d. If law enforcement asks you for your prohibited items, you must turn them over immediately.
- e. Within 48 hours of receiving this order, you must file a receipt with the court that proves all prohibited items have been turned in, sold, or stored. (You may use form DV-800/JV-270, Receipt for Firearms, Firearm Parts, and Ammunition.) If law enforcement served you with the restraining order, you must give a copy of the receipt to that law enforcement agency.

(6) ☐ Restrained Person Has Prohibited Items

The court finds that you have the following prohibited items:

a. Firearms and/or firearm parts

Description (include serial number, if known)	Location, if known	Proof of compliance received by the court
(1) _____	_____	<input type="checkbox"/> (date): _____
(2) _____	_____	<input type="checkbox"/> (date): _____
(3) _____	_____	<input type="checkbox"/> (date): _____
(4) _____	_____	<input type="checkbox"/> (date): _____

b. Ammunition

Description	Amount, if known	Location, if known	Proof of compliance received by the court
(1) _____	_____	_____	<input type="checkbox"/> (date): _____
(2) _____	_____	_____	<input type="checkbox"/> (date): _____
(3) _____	_____	_____	<input type="checkbox"/> (date): _____
(4) _____	_____	_____	<input type="checkbox"/> (date): _____

This is a Court Order.

Case Number: 23-FAM-01495

7 ☐ Court Hearing to Review Firearms (Guns), Firearm Parts, and Ammunition Compliance

In addition to the hearing listed on form DV-109, item (3), you must attend the court hearing listed below to prove that you have properly turned in, sold, or stored all prohibited items (described in (5)b) you still have or own, including any items listed in (6). If you do not attend the court hearing listed below, a judge may find that you have violated the restraining order and notify law enforcement and a prosecuting attorney of the violation.



Date: _____

Dept.: _____

Time: _____

Room: _____

Name and address of court, if different than court address listed on page 1

8 Cannot Look for Protected People

You must not take any action to look for any person protected by this order, including their addresses or locations.

☐ If checked, this order was **not granted** because the judge found good cause not to make the order.

9 Order to Not Abuse ☐ Not requested ☐ Denied until the hearing ☐ Granted as follows:

You must not do the following things to the person in (1) and any person listed in (3):

- Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, molest, destroy personal property, keep under surveillance, impersonate (on the internet, electronically, or otherwise), block movements, annoy by phone or other electronic means (including repeatedly contact), or disturb the peace.
- "Disturb the peace" means to destroy someone's mental or emotional calm. This can be done directly or indirectly, such as through someone else. This can also be done in any way, such as by phone, over text, or online. Disturbing the peace includes coercive control.
- "Coercive control" means a number of acts that unreasonably limit the free will and individual rights of any person protected by this restraining order. Examples include isolating them from friends, relatives, or other support; keeping them from food or basic needs; controlling or keeping track of them, including their movements, contacts, actions, money, or access to services; and making them do something by force, threat, or intimidation, including threats based on actual or suspected immigration status. Coercive control includes reproductive coercion meaning controlling someone's reproductive choices, such as using force, threat, or intimidation to pressure someone to be or not be pregnant, and to control or interfere with someone's contraception, birth control, pregnancy, or access to health information.

This is a Court Order.



Case Number: 23-FAM-01495

10 No-Contact Order ☐ Not requested ☐ Denied until the hearing ☐ Granted as follows:

- a. You must **not contact** ☐ the person in ① ☐ the persons in ③ directly or indirectly, by any means, including by telephone, mail, email, or other electronic means.
- b. ☐ Exception to 10a:
- (1) ☐ You may have brief and peaceful contact with the person in ① only to communicate about your children for court-ordered visits.
- (2) ☐ You may have contact with your children only during court-ordered contact or visits.
- (3) ☐ Other (*explain*): _____
- c. Peaceful written contact through a lawyer or process server or another person for service of legal papers related to a court case is allowed and does not violate this order.

11 Stay-Away Order ☐ Not requested ☐ Denied until the hearing ☐ Granted as follows:

- a. You must stay at least (*specify*): _____ yards away from (*check all that apply*):
- ☐ Person in ①. ☐ School of person in ①.
- ☐ Home of person in ①. ☐ Persons in ③.
- ☐ Job or workplace of person in ①. ☐ Children's school or child care.
- ☐ Vehicle of person in ①. ☐ Other (*explain*): _____
- b. ☐ Exception to 11a:
- The stay-away orders do not apply:
- (1) ☐ For you to exchange your children for court-ordered visits. You must do so briefly and peacefully.
- (2) ☐ For you to visit with your children for court-ordered contact or visits.
- (3) ☐ Other (*explain*): _____

12 Order to Move Out ☐ Not requested ☐ Denied until the hearing ☐ Granted as follows:

You must take only personal clothing and belongings needed until the hearing and move out immediately from (*address*): _____

13 Other Orders ☐ Not requested ☐ Denied until the hearing ☐ Granted as follows:

This is a Court Order.

Case Number: 23-FAM-01495

14 Child Custody and Visitation ☐ Not requested ☐ Denied until the hearing ☐ Granted as follows:Granted on the attached form DV-140, *Child Custody and Visitation Order*, and☐ (list other form): _____.**15 Protect Animals** ☐ Not requested ☐ Denied until the hearing ☐ Granted as follows:a. ☐ You must stay at least _____ yards away from the animals listed below.b. ☐ You must not take, sell, hide, molest, attack, strike, threaten, harm, get rid of, transfer, or borrow against the animals.c. ☐ The person in ① is given the sole possession, care, and control of the animals listed below.

Name (or other way to ID animal)	Type of animal	Breed (if known)	Color
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

16 Control of Property ☐ Not requested ☐ Denied until the hearing ☐ Granted as follows:Until the hearing, **only** the person in ① can use, control, and possess the following property:

17 Health and Other Insurance ☐ Not requested ☐ Denied until the hearing ☐ Granted as follows:The person ☐ in ① ☐ in ② is ordered **not** to cash, borrow against, cancel, transfer, dispose of, or change the beneficiaries of any insurance or coverage held for the benefit of the parties—or their children, if any—for whom support may be ordered, or both.**18 Record Communications** ☐ Not requested ☐ Denied until the hearing ☐ Granted as follows:

The person in ① may record communications made by the person in ② that violate this order.

This is a Court Order.

Case Number: 23-FAM-01495

19 Property Restraint ☐ Not requested ☐ Denied until the hearing ☐ Granted as follows:

The person ☐ in ① ☐ in ② must not transfer, borrow against, sell, hide, or get rid of or destroy any property, including animals, except in the usual course of business or for necessities of life. In addition, each person must notify the other of any new or big expenses and explain them to the court. (If the court granted ⑧, the person in ② must not contact the person in ①. To notify the person in ① of new or big expenses, have a server mail or personally give the information to the person in ① or contact their lawyer, if they have one.)

20 Pay Debts Owed for Property ☐ Not requested ☐ Denied until the hearing ☐ Granted as follows:

The person in ② must make these payments until this order ends:

Pay to: _____ For: _____ Amount: \$ _____ Due date: _____

Pay to: _____ For: _____ Amount: \$ _____ Due date: _____

Pay to: _____ For: _____ Amount: \$ _____ Due date: _____

21 Orders That May Be Made at the Hearing Date (Court Date)

If the person in ① checked any of these orders on form DV-100, a judge could grant them at your court date.

- Child Support
- Lawyer's Fees and Costs
- Batterer Intervention Program
- Spousal Support
- Pay Expensed Caused by Abuse
- Transfer of Wireless Phone Account

22 No Fee to Serve (Notify) Restrained Person

The sheriff or marshal will serve this order for free.

Bring a copy of all the papers that you need to be served to the sheriff or marshal.

23 ☐ **Attached pages** (All of the attached pages are part of this order.)

a. Number of pages attached to this nine-page form: _____

b. Attachments include forms (check all that apply):

☐ DV-140 ☐ DV-145 ☐ DV-820 ☐ Other: _____

Judge's Signature

Date: 07/19/2023

DENIED_____
Judge or Judicial Officer**This is a Court Order.**

Case Number: 23-FAM-01495

Certificate of Compliance With VAWA

This temporary protective order meets all “full faith and credit” requirements of the Violence Against Women Act, 18 U.S.C. section 2265 (1994) (VAWA), upon notice of the restrained person. This court has jurisdiction over the parties and the subject matter; the restrained person has been or will be afforded notice and a timely opportunity to be heard as provided by the laws of this jurisdiction. **This order is valid and entitled to enforcement in each jurisdiction throughout the 50 states of the United States, the District of Columbia, all tribal lands, and all U.S. territories, commonwealths, and possessions and shall be enforced as if it were an order of that jurisdiction.**

Warnings and Notices to the Restrained Person in ②**Your Address to Receive Court Orders**

If the judge makes a restraining order at the hearing (court date), which has the same orders as in this Temporary Restraining Order, you will get a copy of that order by mail at your last known address, which is written in ② on page 1. If your address was not listed on this form or is incorrect, contact the court. If you did not attend your hearing and want to know if the judge granted a restraining order against you, contact the court.

Child Custody, Visitation, and Support

- **Child custody and visitation:** If you do not attend your hearing (court date), the judge can make custody and visitation orders for your children without hearing from you.
- **Child support:** The judge can order child support based on the income of both parents. The judge can also have that support taken directly from a parent's paycheck. Child support can be a lot of money, and usually you have to pay until the child is age 18. File and serve **form FL-150, *Income and Expense Declaration***, or **form FL-155, *Financial Statement (Simplified)***, if you want the judge to have information about your finances. Otherwise, the court may make support orders without hearing from you.
- **Spousal support:** File and serve **form FL-150, *Income and Expense Declaration***, so the judge will have information about your finances. Otherwise, the court may make support orders without hearing from you.

Firearms (Guns), Firearm Parts, and Ammunition

Under California law, you cannot have any firearms (guns), certain firearm parts, or ammunition. (Family Code sections 6216 and 6389(a)). Ask the court for information on how to properly turn in, sell, or store these items in your city or county. You can also contact your local police department for instructions.

This is a Court Order.

Case Number: 23-FAM-01495

Instructions for Law Enforcement

This order is effective when made. It is enforceable by any law enforcement agency that has received the order, is shown a copy of the order, or has verified its existence on the California Law Enforcement Telecommunications System (CLETS). If the law enforcement agency has not received proof of service on the restrained person, and the restrained person was not present at the court hearing, the agency shall advise the restrained person of the terms of the order and then shall enforce it. Violations of this order are subject to criminal penalties.

Duties of Officer Serving This Order

The officer who serves this order on the Restrained Person must do the following:

- Ask if the Restrained Person is in possession of any of the prohibited items listed in (6), or has custody or control of any that they have not already turned in.
- Order the Restrained Person to immediately surrender to you all prohibited items.
- Issue a receipt to the Restrained Person for all prohibited items that have been surrendered.
- Complete a proof of personal service and file it with the court. You may use form DV-200 for this purpose.

Within one business day of service, submit the proof of service directly into the California Restraining and Protective Order System (CARPOS), including the serving officer's name and law enforcement agency.

Arrest Required if Order Is Violated

If an officer has probable cause to believe that the restrained person had notice of the order and has disobeyed the order, the officer must arrest the restrained person. (Penal Code sections 836(c)(1), 13701(b).) A violation of the order may be a violation of Penal Code section 166 or 273.6.

If the Protected Person Contacts the Restrained Person

Even if the protected person invites or consents to contact with the restrained person, the orders remain in effect and must be enforced. The protected person cannot be arrested for inviting or consenting to contact with the restrained person. The orders can be changed only by another court order. (Penal Code section 13710(b).)

Child Custody and Visitation

Child custody and visitation orders are listed on form DV-140 or another attached form. If the judge made these orders, look at items (10) and (11) of this order to see if the judge granted an exception for brief and peaceful contact with the person in (1) as needed to follow court-ordered visits. Contact by the person in (2) that is **not** brief and peaceful is a violation of this order. **Forms DV-100 and DV-105 are not orders. Do not enforce them.**

This is a Court Order.

Conflicting Orders—Priorities for Enforcement

If more than one restraining order has been issued protecting the protected person from the restrained person, the orders must be enforced in the following priority (see Penal Code section 136.2 and Family Code sections 6383(h)(2), 6405(b)):

1. **Emergency Protective Order (EPO):** If one of the orders is an *Emergency Protective Order* (form EPO-001), provisions (e.g., stay away order) that are more restrictive than in the other restraining/protective orders must be enforced. Provisions of another order that do not conflict with the EPO must be enforced.
2. **No-Contact Order:** If a restraining/protective order includes a no-contact order, the no-contact order must be enforced. Item (10) is an example of a no-contact order.
3. **Criminal Protective Order (CPO):** If none of the orders include an EPO or a no-contact order, the most recent CPO must be enforced. (Family Code sections 6383(h)(2) and 6405(b).) Additionally, a CPO issued in a criminal case involving charges of domestic violence, Penal Code sections 261, 261.5, or former 262, or charges requiring sex offender registration must be enforced over any civil court order. (Penal Code section 136.2(e)(2).) All provisions in the civil court order that do not conflict with the CPO must be enforced.
4. **Civil Restraining Orders:** If there is more than one civil restraining order (e.g., domestic violence, juvenile, elder abuse, civil harassment), then the order that was issued last must be enforced. Provisions that do not conflict with the most recent civil restraining order must be enforced.

(The clerk will fill out this part.)

—Clerk's Certificate—

Clerk's Certificate
[seal]

I certify that this *Temporary Restraining Order* is a true and correct copy of the original on file in the court.

Date: _____ Clerk, by _____, Deputy

This is a Court Order.

LAW OFFICES OF THOMAS M. BUNDY

Thomas M. Bundy, Esq. (SBN 297889)
3595-1 Inland Empire Blvd., Ste. 1240
Ontario, CA 91764
Tel.: (909) 281-3500
Fax: (909) 281-3501

Attorney for Respondent,
MAHSA PARVIZ

Electronically
FILED
by Superior Court of California, County of San Mateo
ON 7/19/2023 1:36 PM
By /s/ Zachary Maffei
Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO**

MAHSA PARVIZ

Petitioner,

And

ANDREW WATTERS,

Respondents

Case No.

**DECLARATION OF MASHA PARVIZ IN
SUPPORT OF DVRO**

I, MAHSA PARVIZ, DECLARE:

1. "My name is Dr. Mahsa Parviz. I am over 18 years of age, am fully competent to make this Declaration and have personal knowledge of the facts stated herein. To my knowledge, all of the facts stated in this Declaration are true and correct."

2. "I am the Petitioner in this matter. I make this Declaration in support of my request for a domestic violence restraining order against Respondent Andrew George Watters."

3. "The exhibits to this declaration must be filed under seal pursuant to California Rules of Court Sec. 5.552, California Welfare & Institutions Code Sec. 827 and the sealing order in Travis County,

1 Texas cause number D-1-DC-21-900031."

2 4. "Andrew George Watters is a local attorney with a lengthy California State Bar disciplinary
3 history who claims his law firm generates millions of dollars of revenue per year. He and his law
4 firm, Andrew Watters PC, began representing me in April 2021. Andrew Watters wrote to the
5 Texas prosecutor wherein he represents himself as my attorney and attempts to negotiate the terms
6 of a confidential cooperation agreement and enforce a restraining order. In 2021, I had the Austin
7 PD file a Summary Incident Report number 2021-8003210, documenting the serious threat to me
8 and my family in relation to Respondent's legal representation, which will likely worsen without
9 issuance of a restraining order against Mr. Watters.

10 5. I met with Mr. Watters only a handful of times in public to discuss legal matters but Mr.
11 Watters took advantage of my vulnerable situation. He became infatuated with me and wanted to
12 date while continuing his legal representation, even though he knew I was married and not
13 interested in him. Although my agreement to discreetly date him was conditioned on his specific
14 performance of legal services and payment of expenses, he held onto the delusion that he was
15 actually in a "personal romantic relationship" with me and went as far as creating a "hall of shame"
16 about me and my family on his law firm webpage at <https://www.andrewwatters.com>."

17 6. Each time we met, he consumed so much alcohol that I had to get him a hotel room, which he
18 stayed at on and off for months because he didn't have a functional shower at his parents' one
19 bedroom apartment and storage in San Mateo, at which he still resides. In May 2021, law
20 enforcement documented Mr. Watters' unstable behavior as my attorney, alcohol abuse and four
21 750 ml bottles of his hard liquor in the hotel room.

22 7. He proposed a partnership, which I declined upon review of his business bank account
23 statements. I tried to distance myself once he showed me his law firm's Chase business account
24 statements and I noticed \$500 payments to prostitutes, debits that I recognized are from the IRS,
25 and absolutely no earnings at the end of each month despite approximately \$40,000.00 credited
26 monthly to the account. I inquired about the concerning transactions and he informed me of his six-
27 figure IRS tax debt and that he was diagnosed with Bipolar Disorder about 15 years ago after
28 finishing law school when he stayed up for 6 days straight without using any substances in an

1 attempt to apply for jobs and was subsequently hospitalized due to psychosis.

2 8. His psychiatrist at Kaiser Permanente North has prescribed him several medications,
3 including the heavy-duty antipsychotic Risperdal, which Mr. Watters abuses daily and combines
4 with alcohol against his doctor's orders.

5 9. My attempts to distance myself and keep my Atherton residence private only made his
6 stalking worse. Mr. Watters started following me to my gym, the Equinox in Palo Alto, California,
7 and would wait for me in the parking lot for several hours. By June 2021, I had told him my
8 Equinox membership had expired in an effort to prevent further stalking. Staff informed me that
9 Mr. Watters was searching for me while I remained at Equinox for several hours, afraid to leave my
10 gym. He waited in the parking lot for 45 minutes after Equinox closed and confronted me on my
11 way to my vehicle. On his law firm webpage, he publicly admits to this, stating "I witnessed her
12 commit at least one petty theft when she deliberately entered a gym without paying after she told
13 me her membership had expired, and then abused their generosity by using the entire facility for
14 hours, even after they closed and I was waiting for her in the parking lot for about 45 minutes.

15 10. Mr. Watters continued stalking me and would share information about me with my former
16 brother-in-law, a disbarred attorney who was facing life imprisonment for the organized crime I
17 reported and against whom I had a restraining order which Mr. Watters attempted to enforce it in
18 April 2021.

19 11. On August 17, 2021, after 5 weeks of not hearing from me, he again tracked my location and
20 mailed me an eerie letter wherein he admits to constantly searching for me, stating "I happened to
21 notice online in a routine search" in reference to my physical location. Although I am well-known
22 in my field as a Harvard-trained medical research scientist and have been an elected member of the
23 American Academy of Neurology since 2016, Mr. Watters continues to contact and spread rumors
24 to my employers, research sponsors and legal team without my consent or knowledge in an attempt
25 to sabotage my career, reputation, peace of mind, the cooperation agreement and related cases. In
26 this letter, he admits to spreading highly inappropriate and false rumors to my legal team and others
27 about my personal life, my mental health and alleged incompetency, stating: "I simply do not think
28 you are competent to stand trial in a Federal felony case, and I have shared this concern with your

1 defense counsel. Feel free to have your attorney reach out ...""

2 12. On October 9, 2021, I sent Mr. Watters a cease and desist letter via email and copied my
3 mother and sister, as well as two of my attorneys, Mr. Thomas Bundy and Mr. Koudiah. I filed a
4 State Bar complaint thereafter but was forced to stop communicating with the California State Bar
5 when Mr. Watters retaliated by creating several horrifying webpages, with photos, explicit content,
6 and attorney-client privileged documents and information, all about me and my family on his law
7 firm webpage.

8
9 13. On his law firm webpage, he publicly makes offensive, false comments about me, about
10 matters he became privy to through the course of his legal representation, and about my whole
11 family. His comments have injured and traumatized my entire family, including my five-year-old
12 daughter, sister, and parents, both of whom are college math professors and senior citizens with
13 conservative, traditional family values. My parents have lost teaching assignments and investments,
14 have been cursed at, publicly ridiculed and have even been hospitalized several times from the
15 emotional turmoil Mr. Watters has created for my entire family.

16 14. Mr. Watters has been posting content about me and my family on his law firm webpage
17 since February or March of 2022 and frequently updates the website with even more repulsive
18 material, such as fabricated claims that my parental rights to my daughter were terminated in Texas
19 and she's currently in foster care; that I had an alcohol-induced miscarriage when underage, that I
20 am wholly uneducated and have various mental illnesses, that I have had sexual relations with
21 numerous men without using protection, that I have been administered the birth control shot, that all
22 of my relationships have ended because I have been unfaithful to my significant other, that I had
23 sexual relations with a surgeon at my sister's wedding over a decade ago, that all my research is
24 fake, that I am homeless but live a lavish lifestyle using my parents' money, that my whole family is
25 just as mentally-ill and irresponsible as I allegedly am, that I print hundred dollar bills, and that I
26 am a sexually promiscuous "5'9" Persian statute" who is "just as attractive" as his wife." Attached
27 hereto as EXHIBIT "A" is a true and correct copy of his "hall of shame" listed on his website.

28 15. Most alarmingly, Mr. Watters has hosted multiple online "forums" about me wherein he

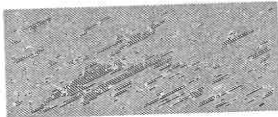
1 claims to have contacted my parents on behalf of "all my friends in Boston", "in an attempt to
2 conduct an intervention" in order to prevent me from having a second alcohol-induced miscarriage.
3 His forums encourage the public to commit hate crimes against me and my family on the basis of
4 our Persian-American heritage and the various rumors he has manufactured. Just within the past
5 month, I was physically attacked and called a "baby killer" due to Mr. Watters' public disclosure
6 and falsification of my medical records from when I was a minor, which he obtained over the
7 course of his legal representation.

8 16. He has attempted to isolate me from my daughter by publicly claiming she's in foster care,
9 when she is not, and that I have no parental rights to her, even though he personally verified that
10 there has never been a judgment in a suit affecting my parent-child relationship with my daughter.
11 Attached hereto as 'EXHIBIT C' and fully incorporated herein for all purposes is a true and correct
12 copy of the Texas Vital Statistics Unit certification of September 10, 2021, confirming that there is
13 no judgment affecting the parent-child relationship to my daughter, which was requested by and
14 sent directly to Mr. Watters in his capacity as an attorney with a legitimate need for this confidential
15 information.

16 17. "My family and I have had enough and need Mr. Watters and his law firm to stop
17 distributing the aforementioned content about me and my family, whether online or through other
18 means. We are terrified of Mr. Watters and believe this man will not stop until he is behind bars
19 with my former brother-in-law, who has also contributed to this heinous and publicized abuse. Law
20 enforcement has directed me to obtain a domestic violence restraining order to end the ongoing
21 physical and emotional abuse and so that Mr. Watters will be arrested if he doesn't stop engaging in
22 the conduct complained of herein."

23
24 I declare under penalty of perjury under the laws of the State of Washington that the foregoing is
25 true and correct, and that this declaration is executed on July 18, 2023, at Seattle Washington

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EXHIBIT “A”

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MAHSA PARVIZ

An honest assessment/review



March 11, 2022

by Andrew G. Watters



Her false c.v., which she sent to me in May 2021. **NEW**

Mahsa Parviz, aka Mahsa Parviz-Khyavi, aka Mahsa Parvis, is quite simply the worst person I have ever met in my life-- narrowly taking the crown from my former business collaborator Ben Cannon. While the harm to society caused by Ben is objectively worse considering that Ben has an entire fake telecom company that has scammed people out of possibly millions of dollars, the difference is that Mahsa is someone I was emotionally involved with in my personal life and at one point cared very much about. Anyway, Mahsa is a diabolically clever sociopath, a pathological liar, delusional, suffering from an undetermined mental illness, and is also now a nine-time convicted felon. Most

recently, she was convicted of two felonies in Federal court after a jury trial in December 2021, which arose from her falsifying a passport application in order to kidnap her estranged daughter to a non-extradition country (case no. CR 21-293-DMG in the U.S. District Court for the Central District of California). I am so glad I didn't have to testify in her trial, but that's only because I made it clear to her lawyer's investigator that I would be speaking the truth, the whole truth, and nothing but the truth-- not covering for her or vouching for her as she asked me to do. Despite making my views clear, despite recently marrying my dream girl (which Mahsa bizarrely congratulated me for), and despite my repeated demands that she stop sending me letters, texts, and emails, and stop calling me, Mahsa *still* keeps reaching out to me for reasons unknown. I mean, damn, I didn't know I was all that, but in any case, I'm sure I'm not alone in being the victim of her fraud and the subject of her continuing attention.

I decided to post this web page because I have no other way to deter Mahsa from continuing to contact me, and because it really pissed me off that she was impersonating a Harvard Medical School graduate (and I believed her). I am posting this web page with the full support of my wife, who understands my reasons. Hopefully I will shame Mahsa into silence with the truth, and also provide fair warning to other people who fall victim to her lies and fraudulent schemes (just like I have with Ben Cannon). So let me make one thing clear at the outset: until February 2, 2022 when I discovered the truth, I fully believed that Mahsa, who still signs her emails as "Dr. Parviz" or "Mahsa Parviz, M.D. Ph.D.," *actually held* those degrees from Harvard due to her fake Harvard web page that she somehow posted on the official Harvard website, as well as her actually functional Harvard email address (mparviz@fas.harvard.edu). "Dr." Parviz, it turns out, *was never a student at Harvard Medical School*. She was in the Extension program at Harvard, which she did not complete, and has never earned any degrees there. I discovered this when I found a declaration from a Dean at Harvard explaining that Mahsa's frivolous lawsuit against Harvard for the return of her (non-existent) transcripts was totally and completely without merit. It appears from her application that she attended a junior college in Texas, followed by the University of Texas, which she may or may not have completed. So she at least has a high school diploma or GED, as admitted in her pre-sentencing objections...great.

Let's start at the beginning, which was April 2021. I had posted a profile on a major online dating website. I found Mahsa in a search for tall, attractive, athletic women under 35 with graduate degrees (lol). Yeah, she was seriously attractive-- a 5'9 dark-haired Persian statue, basically. Unfortunately I deleted all those photos when it became clear that she was a beautiful psycho. Anyway, we met in April 2021 (she was 45 minutes late for our first date, and I nearly left). We hit it off great and were talking about how great we were for each other. Everything seemed great for 24 hours, but then I googled her. In addition to her Harvard persona, her mug shot from one of her cases came up and I was confused. Wait a second...did I just...you know...with a multiple felon who was pretending to be someone else? Oh my freaking god.

"Every nerve ending, all of my senses, the blood in my veins, everything I had was screaming, 'Take off, man, just bam, get the fuck outta there!' Panic hit me like a bucket of water. First there was the shock of it--BAM, right in the face! Then I'm just standing there drenched in panic." --Mr. Orange, *Reservoir Dogs* (1992)

But wait...was this really the same person? That's where it got confusing. She had talked about wanting to complete the Law Office Study Program offered by the State Bar of California in order to...become a lawyer. A lawyer who pled guilty to attempted kidnapping, evading the police, apparently forging a judge's signature, and other felonies? Impossible that this was the same person.

It was the same person. Mahsa Parviz, at that point a seven-time convicted felon, actually asked me to study law in my office so she could become a lawyer. I told her that if those things were true, then she had zero chance of ever becoming a lawyer with that record, and it was a complete waste of effort that I was not willing to undertake. I asked her to explain her possible multiple felonies, and she initially said those had all been dismissed. But that's not what the dockets showed-- the dockets showed that her *appeals* had been dismissed as part of her *guilty pleas*. What the hell was going on? I explained this to her and she steadfastly denied ever being convicted of these seven felonies. Was I supposed to believe or not believe her without independent proof? I have no idea. Obviously, now I know the truth, but at the time it wasn't clear. By the way, she said she was not married (also a lie-- she was briefly

married to the father of her child and apparently still is because her nullity petition in L.A. County was dismissed for lack of prosecution).

Let me be clear on another thing: I never was hired as Mahsa's attorney, nor did I ever appear for her in any case or file papers for her. I did help out with a couple legal issues as best I could while dating her, which is perfectly legal. At no point in this essay do I reveal anything confidential, which in any case (i.e., like Ben Cannon) would be covered by the crime/fraud exception, in that Mahsa was committing crimes, was a fugitive from justice on a Texas warrant, and was otherwise scamming me into helping her get her daughter back (her parental rights had been terminated in Texas). She was obsessed with this crusade to the point of extorting me into providing legal help by threatening to end the relationship if I didn't comply. Of course it seemed less sick at the time when I was blinded by the possibility of having finally met someone great for me after a long drought.

This email that I sent to the Harvard IT department in February 2022 sums it up well:

Dear Mr. Dash,

You're listed as the Administrative Contact in the harvard.edu domain name record, and you seem to be the appropriate recipient for this inquiry.

I am a lawyer in California. I have been following the case of USA v. Parviz, which is a Federal criminal case in Los Angeles, CA against Mahsa Parviz. Ms. Parviz was recently convicted of filing a false passport application and aggravated identity theft in connection with an attempt to abduct her estranged biological daughter from foster care.

Ms. Parviz and I were in a personal romantic relationship in Spring 2021. When I learned that she was (at that time) a seven-time felon, was suffering from poorly treated or untreated mental illness, and was a compulsive liar, I ended the relationship. What I didn't know until yesterday 2/2/2022 was that she never attended Harvard Medical School and never earned a M.D. or Ph.D. there, contrary to her continuous representations-- at least as of October 2021, she continued to sign her emails with both of her non-existent degrees.

At the beginning of the relationship, I tried to do my due diligence by Googling her, and my search produced the following legitimate-looking Harvard web pages:

<https://scholar.harvard.edu/mparviz>

<https://collaborate.med.harvard.edu/display/~MP284/Parviz%2C+Mahsa>

She also had a valid Harvard email address that she used to accept email-- which is still valid as of today, as verified by connecting to the Harvard email server via Telnet: mparviz@fas.harvard.edu

Finally, Ms. Parviz has several purported publications, and even courses she supposedly taught, listed on her Harvard web pages. The collection of Harvard web pages and related materials made me believe that she had the degrees she represented, and I didn't feel the need to look further. The fake Harvard persona tipped the balance between dating her and not dating her, as well as believing her or not believing her, as I'm sure it has for other guys as well.

It turns out that Ms. Parviz was enrolled in Harvard Extension School for a time, according to records filed in a lawsuit in 2017 when Ms. Parviz sued Harvard to release her non-existent Harvard Medical School transcripts. Please see attachment, which is the declaration of the H.E.S. Dean explaining the circumstances, and attaching Ms. Parviz's application for Harvard Extension School that clearly shows Ms. Parviz's situation. I have no idea why Ms. Parviz would sue Harvard knowing that she never attended Harvard Medical School and could not possibly have any transcripts there, but perhaps that is due to some type of mental condition.

Anyway, Ms. Parviz appears to have hacked or at least misused her Harvard Extension credentials to create a fake identity on the Harvard website and make people think that she was an accomplished medical researcher and graduate of Harvard. Her Harvard web pages readily appear on Google when people search for her name, although her criminal cases have taken precedence at this point.

I am counting myself lucky to have not (so far) had permanent fallout from this toxic relationship, other than a continuous stream of harassing and inappropriate emails, letters, and texts. But I would like to ask Harvard to at least consider deleting Ms. Parviz's web pages and disabling her email address for violations of the Harvard acceptable use policy so that her substantial fraud does not continue. The imprimatur of Harvard is a big deal and is worth protecting from frauds and cheats.

I'm cc'ing the prosecutors in Ms. Parviz's case because I think Ms. Parviz's fraudulent Harvard persona is relevant to her sentencing, which is coming up in March 2022. She's at least rational enough to know that impersonating a Harvard M.D./Ph.D. is wrong, and I hope that this awareness and her bad behavior factor into her sentencing in some fashion.

Best,

Andrew Watters

So...you be the judge. Was I reasonable in believing her when she steadfastly, repeatedly, and consistently claimed to have Harvard degrees that appeared confirmed by her official-looking Harvard web pages? I don't know. She had photos and other evidence showing that she worked at the hospital at Harvard

in some capacity, and lots of credible-sounding stories. But let's continue with the story.

Colorful highlights of this awful experience include, but are not limited to:

1. She once asked me to reload a prepaid American Express card for her while she waited in the car, and it's still unclear to me whether the hundred dollar bills she handed me were authentic or counterfeit. I had this thought and realized the risk while the 7-11 clerk was counting out the bills and then hesitated (while looking at me a little funny) before handing them back to me when Mahsa's AMEX prepaid card was declined to be reloaded. I shrugged, then I bought a few small items in the store and acted as normal as I could while the clerk was staring at me. I was *absolutely sweating bullets* as I walked out of that store because I knew that I would be the one to get in trouble for handing the clerk an envelope of possibly fake bills without actually looking at the bills first...yeah, what a dummy for trusting her. Thank god the card was declined, which on a reload could only mean one thing...Mahsa was on the run (turns out she had an active warrant in Texas). In all fairness, I did glance at the bills after the reload failed, and I didn't see anything suspicious, which is why the relationship continued. But my point is that this is how easily I could have been arrested and possibly lose my law license because of Mahsa manipulating me. Wow, she is truly diabolical and has absolutely no regard for other people.
2. She was legally homeless (she claimed to be searching for a place after recently moving back to the area from Texas) and bounced around from hotel to hotel depending on whichever hotel would let her stay there with a prepaid card. Her parents gave her a lot of money, which is how she supported herself while being unable to work a normal job.
3. She was charged with grand theft in state court for allegedly stealing a guy's jewelry and Adderall. The case has languished in Santa Clara County, presumably due to her Federal charges and conviction.
4. I witnessed her commit at least one petty theft when she deliberately entered a gym without paying after she told me her membership had expired, and then abused their generosity by using the entire facility for

hours, even after they closed and I was waiting for her in the parking lot for about 45 minutes.

Don't get me wrong-- there were some positive things in the relationship after she assured me she was not a seven-time felon and also swore that to the extent she had legal problems, it's because she was framed by her former brother-in-law, a lawyer in Texas. I thought that maybe this was my destiny: a beautiful, superintelligent young woman who was a possibly reformed criminal but who adored me, and that this was my chance to finally have someone in my life. What could I do?

Okay, so fast forward to early June 2021. After yet another argument where she threatened to dump me if I didn't help get her daughter back, and another series of erratic, bizarre SnapChat audio messages at 3 a.m., I decided that I had had enough. I dumped her and sent her a Dear Jane email. I blocked her on SnapChat, phone, and email, and promised myself that I would never make the same mistakes again.

After about five weeks of not hearing from her, I felt a sense of relief, but also a sense of curiosity. Why hadn't I heard from her when she had been so vocal in her desire to rekindle the relationship? I googled her again and was shocked to see USA v. Parviz, the Federal criminal case regarding the false passport application. I confirmed that she was in custody using the Federal inmate locator, and that answered my question. Part of me felt bad for her and the other part of me felt glad that she was behind bars. So I felt conflicted...and keep in mind, at this point I still thought she was an accomplished medical researcher with M.D. and Ph.D. degrees from Harvard. So what did I do? I wrote her a letter stating how I felt, as well as my concerns about her competency to stand trial in a Federal criminal case. Whoops...this appears to have prompted the ongoing campaign of harassment I have experienced.

First, she started writing me letters-- about twenty pages of letters, many of which talked about the future in an endearing fashion. Then she starting calling, texting, and emailing. I was still developing the situation, so I didn't know what to do. I didn't want to talk to her on jail calls, and I didn't want to get texts from her. So I let her send emails. Honestly it was an engaging correspondence for about a month and a half until I finally blocked her after

yet another inappropriate series of messages. I can't recall exactly what she said, but it was something about being taken care of financially by someone else who she was talking to. I thought, wait a second-- you send me letters talking about a future with me and then you threaten to pick someone from a purportedly deep pool of suitors? Sick, which is how she thinks.

So yeah, by then I had met my now-wife and the rest is history. But I still keep getting calls, texts, and emails from Mahsa and/or her mom. The last straw was yet another time-wasting request where Mahsa asked me to send her "file" to her attorney, who her mom confirmed was the longtime family attorney. The problem is, when I reached out to confirm the request with the attorney, he said he didn't represent Mahsa-- and he didn't respond to my subsequent email asking if he still wanted anything I had gathered while helping out Mahsa with her legal problems. I then blocked Mahsa's latest phone number (somehow she keeps sending texts from jail), complained to the Bureau of Prisons, and made it clear that if I get a single additional communication from Mahsa, I will finally get that restraining order I talked about previously. I am not sure what that would accomplish considering that Mahsa is already in jail, but it would be a symbolic gesture at least. I am finally taking this complaint online because I have nothing else I can do at this point to stop her harassing communications for good.

What did I learn from all this? Well, some people are just so screwed up that they can't help but commit felonies. Mahsa appears to be one of those people. In retrospect, I just have to recognize that I am the victim of a scam and go from there. At least I don't appear to have any lasting effects from this toxic relationship, other than emotional trauma from the roller coaster I experienced. I am eternally thankful that I was able to resist the temptation of someone so wrong but so attractive, in order to meet someone so right (and just as attractive), who I am with now.

If further proof is needed, just check out the summary of the trial evidence from the government that's in their opposition to Mahsa's motion for acquittal. Sad. The motion for acquittal was obviously denied. And she hasn't even tried to appeal her conviction!

To be continued...not bad for one day of effort! I have way more things to share, but I will start by adding more supporting documents as I find the time so that this is finished once and for all and is unassailable proof that this walking disaster of a person needs to disappear for the length of her sentence, which I estimate at five years given her lengthy and serious criminal history. Looks like May 3, 2022 for sentencing.

Update March 14, 2022 - the Harvard information security department is looking at the web pages and they sent a polite email back.

Update March 19, 2022 - Harvard deleted her fake web page.

Update March 21, 2022 - I've heard from a couple other victims, as well as one person who wants to post counterpoint-type mitigating factors on here. After much consideration, I've decided that I'm going to host a counterpoint/mitigation section below with comments and supporting documents from persons who want to defend Mahsa in some fashion-- as long as they take responsibility for whatever they post on here with their names and contact information. It's only fair to permit that since I have a megaphone here while Mahsa is in prison and can't respond.

Update April 4, 2022 - I had a very interesting conversation with another victim who says Mahsa tried to take him for a million dollars. Wow.

Update June 19, 2022 - Mahsa's sentencing will be in July 2022. Meanwhile, she followed through on her extortionate threat to report me to the State Bar if I didn't remove my web page. I received a letter of inquiry, to which I responded within 20 minutes. I have nothing to hide and I categorically deny doing anything improper. As a thank-you for her extorting me, I am going to post an email I received from one of her Boston-area friends, who says he sent the following email to Mahsa's family in an effort to conduct an intervention. Here it is, verbatim:

Dear Mr. Parviz,

My name is Andrew Taylor; I have been a friend of your daughter Mahsa for a few months now. Mahsa is an intelligent, hard-working, lovely young woman in whom I see tremendous potential. However, as I'm sure you're aware, she has led a lifestyle here in Boston that is causing me and the rest of her friends great concern. We wish to intervene and help her make better

decisions but we don't quite know where to start; I am writing today to solicit your input. Among her concerning behaviors:

-Compulsive drinking. Mahsa, despite being legally underage, consumes significant amounts of alcohol on a daily basis, despite having endured an alcohol-induced miscarriage during her relationship with Mark as well as having been arrested for DUI. Her alcohol consumption has reached the point that we cannot take her to a restaurant that serves alcohol without her ordering several drinks, regardless of her ability to afford them or any events on her agenda that would require her to present a polished image; there have been several instances where Mahsa's alcohol consumption has resulted in her missing job interviews and classes at Harvard. I have personally witnessed her using her sister's driver's license numerous times as a means to enter liquor stores and drinking establishments.

-Compulsive shopping and financial irresponsibility. Mahsa owns numerous clothing articles from very reputable name brands (Gucci, Prada, etc.) and continues to buy many more, yet she has no clear means of affording them. Visits to her apartment have resulted in her friends, myself included, finding notices from Neiman Marcus, Macy's and Walmart, demanding immediate payment for significantly large credit balances Mahsa owes them; Mahsa recently disclosed to her boyfriend [redacted] that her credit score is only slightly higher than 500, which doesn't qualify her for a loan of any sort. To illustrate her lack of financial responsibility, this semester, she complained to her boyfriend, [redacted], that she was unable to afford her tuition for the semester. [redacted] immediately suggested that she return some of her very expensive clothing items, in response to which she threatened to divorce him if he ever suggested such an idea if they were to get married. Further, she has bragged to several of her friends, myself included, that nothing gets her parents to send money to fuel her shopping habits more quickly than the phrase "Mommy, I'm hungry!".

-Poor language. Mahsa doesn't hesitate to use obscenities when addressing her friends, especially if she is upset. I recently inquired with her about why her Facebook and LinkedIn profiles suggest she is a PhD candidate at Harvard, when I know first-hand that she is attempting to get into the ALM (Master of Liberal Arts) program in finance at Harvard. Her response was the following:

"Hey fat fuck! Yeah I'm getting my masters and my phd. Go stick it up your butt buddy [redacted]'s ass and don't speak to me again. I don't talk to your kind loser. :)...you have no friends you depressed fucking loser"

I wish I could tell you that outbursts like these are rare but unfortunately, they are quite common. Mahsa routinely talks like this to anyone here in Boston who has the nerve to refuse her demands, most commonly for alcohol and money, or when the truth in her statements comes under question.

-Sexual promiscuity. Mahsa has disclosed to [redacted] that she has had numerous sexual partners, many of whom with which she has had unprotected sex. She has had numerous relationships, all of which have been terminated as a result of her being sexually unfaithful to her partner; her most recent relationship with [redacted] ended as when she came to Dallas for a

wedding, she had sex with a surgeon she met at the wedding. Mahsa received a birth control shot shortly after she moved to Boston, presumably with money provided by you, and has used this as an excuse to have unprotected sex with men she typically has known for less than a couple of weeks. We are worried that when the shot's potency inevitably wears off, her sexual habits will continue which, combined with her egregious alcohol consumption, will result in Mahsa enduring a second miscarriage.

Mr. Parviz, I'm not writing to you today with the intention of ratting her out, I'm writing because I and all of my mutual friends with her know that this pattern of irresponsibility will result in imminent consequences for her. We wish to intervene before it is too late but she has resisted our efforts and continues to habitually make poor decisions. Any sort of encouragement or advice you can provide to me would be greatly appreciated.

With warmest regards,
Andrew Taylor

And here is my email exchange with the State Bar of California. What a sick joke-- this is the thanks I get for trying to help.

Update July 2, 2022 - Mahsa's State Bar complaint was dismissed, as expected. Meanwhile, the Government filed a pre-sentencing report recommending a sentence of 81 months (6 years 9 months) in prison due to Mahsa's extensive criminal history and flagrant disregard for the law. I was disappointed to see the Harvard angle omitted from the report, but I guess they had enough ammunition without it. According to Mahsa's defense counsel's own psychiatric evaluation of her, she has Borderline Personality Disorder and Bipolar Disorder. I am not surprised in the least by that, nor am I surprised by her trying to get out of a stiff sentence by claiming that her mental health problems caused her to offend. Mahsa deserves to go to prison for a long time, and her sentencing is on July 12, 2022. Will update this with additional documents in the near future, including my restraining order filing that I've finally gotten around to completing.

Update July 3, 2022 - I heard from [redacted], who left me a voicemail stating that he cannot be associated with Mahsa in any way. I debated for a while before redacting his name from Mr. Taylor's email. On the one hand, redacting information is inconsistent with my policy of radical honesty. However, Mr. Taylor vouched for [redacted] and said he knew [redacted] is a good guy. That was enough for me, setting aside privacy concerns. So there you have it, I balanced privacy and radical honesty appropriately in a difficult case. Also, by

request, here is the Government's pre-sentencing report, and Mahsa's response. I laughed out loud at her response, especially in the "acceptance of responsibility" section.

Update July 14, 2022 - Mahsa has been sentenced to 61 months in prison (five years, one month) followed by three years of supervised release during which she has to obtain mental health treatment. I am also ready to pull the trigger on the restraining order, I just need to sign the forms. I guess that's a wrap for now.

Update May 25, 2023 - I was wrong that this is over. Mahsa wrote me a letter threatening to file a frivolous Domestic Violence action against me in San Mateo County, where I practice, specifically to trash my reputation among the local judges-- unless I take down this web page. In case it wasn't clear, I do not censor my website for any reason. Extorting me into removing the web page, which is intended to protect the public from Mahsa's diabolical, illegal schemes, is the last straw. So I filed a lawsuit in the Western District of Washington, where Mahsa is incarcerated. Any interested persons can follow along on PACER using the case number.

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© Andrew G. Watters

Last updated: May 25, 2023 08:12:25

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number, Address) Thomas M. Bundy, Esq. (SBN 297889) 3595-1 Inland Empire Blvd, Suite 1240, Ontario, CA 91764 TELEPHONE NO: 909-281-3500 FAX NO.(Optional): 909-281-3501 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Mahsa Parviz	Reserved for Clerk's Office Stamp <div style="text-align: center;"> Electronically FILED <small>by Superior Court of California, County of San Mateo</small> ON 7/19/2023 1:36 PM By <u>/s/ Zachary Maffei</u> Deputy Clerk </div>
<input checked="" type="checkbox"/> Southern Division, 400 County Center, Redwood City, CA 94063 <input type="checkbox"/> Northern Division, 1050 Mission Road So. San Francisco, CA 94080	
PETITIONER: Mahsa Parviz RESPONDENT: Andrew Watters	CASE NUMBER: 23-FAM-01495
DECLARATION RE: NOTICE OF EX PARTE APPLICATION FOR ORDERS	

I, the undersigned declare:

1. I am in this case the (choose one):

A. <input checked="" type="checkbox"/> attorney for Petitioner	A. <input type="checkbox"/> attorney for respondent	A. <input type="checkbox"/> attorney for child(ren)
B. <input type="checkbox"/> self-represented Petitioner	B. <input type="checkbox"/> self-represented Respondent	
C. <input type="checkbox"/> other (explain):		

2. The opposing party is represented by an attorney: ☐ Yes ☒ No
 The minor child(ren) is/are represented by an attorney: ☐ Yes ☒ No
 [If you checked "Yes", fill in the attorney's name, address, and telephone number. If you checked "No", fill in the other party's name, address and telephone number.]
 Party/Attorney Name:
 Address and Telephone number:

 Child(ren)'s attorney name:
 Address and Telephone number:

3. **NOTICE TO OPPOSING PARTY REQUIREMENT**
 - A. I gave reasonable notice of my Ex Parte Application for Orders (see CRC 5.151) to the opposing party and/or their attorney of record on Date: _____ Time: _____
 in the following manner:
☐ Personal delivery ☐ Fax (by prior agreement) ☐ In person ☐ By telephone
 Other: _____

 - B. ☐ I served copies of the Ex Parte Application and supporting papers to the opposing party and/or their attorney of record on Date: _____ Time: _____
 in the following manner:
☐ Personal delivery ☐ Fax (by prior agreement) ☐ In person ☐ By telephone
 Other: _____

 - C. ☐ I have been informed that the opposing party has received my Application and supporting papers and will be opposing my request for Ex Parte Orders. (describe):

D. I HAVE NOT given notice of the ex parte request for orders because (Check all that apply. You must explain below):

- ☒ This is an application for Domestic Violence Prevention Act (DVPA) restraining orders.
- ☒ Great or irreparable injury will result to me before the matter can be heard on notice (explain below).
- ☐ A good faith effort was made to notify the opposing party but notice was unable to be given (explain below).
 Petitioner alleges Respondent would continue to harass her and post about her on his law firm's public website.
- ☐ The other party agrees to the orders requested.
- ☒ No significant direct burden or inconvenience to the adverse party will be likely to result from the orders sought herein(explain below.)
- ☐ I fear for my physical safety (and that of my children, if applicable).
- ☐ Other:

Explanation:

Respondent would not be inconvenienced by the order. Further, Petitioner alleges Respondent could cause additional harm by updating his law firm's website with personal details about Petitioner.

- E.** ☐ A hearing between the parties is already set on _____, 20____ at _____☐AM ☐PM and I am asking that this motion be heard at the same time.

4. There are the following (temporary) (permanent) orders currently in effect (list orders and dates issued):

5. The parties ☐ have ☐ have not been to Family Court Services for mediation. If yes, mediation was held on _____, 20____, and the mediator was _____. The recommendation of the mediator was:

I declare under penalty of perjury that the foregoing is true and correct.

Date: June 18 2023

Thomas M Bundy

[Type or Print Name]



[Signature]